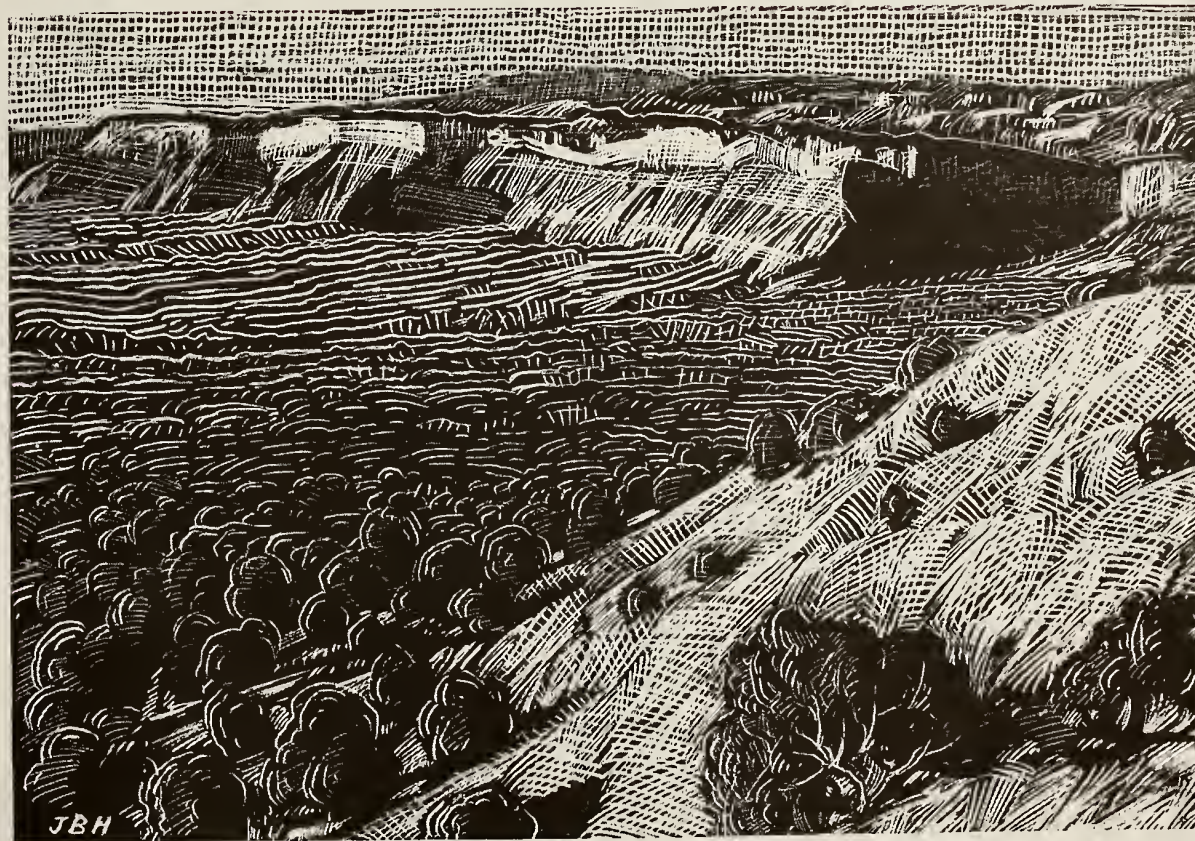


Chapter 5

Public Comments on the DMP/DEIS and Responses



PUBLIC COMMENTS

This chapter addresses the public comments received on the Draft Management Plan/Draft Environmental Impact Statement (DMP/DEIS) and the Bureau of Land Management's (BLM) response to those comments. All written comments were reviewed and considered. Comments that presented new data or addressed the adequacy of the document, the alternatives, or the analysis are responded to in this Proposed Plan pursuant to the BLM's National Environmental Policy Act (NEPA) Handbook (H-1790-1). There were also many comments which, although not required to be addressed, are being clarified in this chapter. Comments expressing personal opinions or that had no specific relevance to the adequacy or accuracy of the Draft Management Plan were considered but not responded to directly. Similarly, comments received after the close of the comment period on March 15, 1999 were considered, but are not addressed in this document.

Over 6,800 letters commenting on the DMP/DEIS were received. Each comment letter was assigned an identification number and specific comments from each letter were organized into appropriate categories. Nine broad categories or areas of concern were developed, and specific comments raised under each category were given a corresponding code (i.e., ACC-1). The broad categories and associated codes are listed below in alphabetical order.

Access and Transportation

ACC-1 to ACC-27

Biological Resources

BIO-1 to BIO-16

General

GEN-1 to GEN-51

Grazing (livestock grazing)

GRAZ-1 to GRAZ-8

Lands (including rights-of-way)

LAND-1 to LAND-8

Recreation

REC-1 to REC-16

Water Resources

WAT-1 to WAT-7

Wilderness Study Areas

WSA-1 to WSA-3

Wild and Scenic Rivers

WSR-1 to WSR-8

All of the identification numbers, names (or organizations), and the corresponding comment response numbers were then entered into a computerized database. The following list displays the names of the organizations and/or names of those individuals who commented on the DMP/DEIS and the corresponding comment codes (shown below the names). Some letters do not have a comment code because the comments did not require a response.

ORGANIZATIONS WHO COMMENTED

3R Minerals

GEN-7

4 Wheel Drive Enthusiasts & Concerned Citizens

4 Wheelers, ATV Enthusiasts & Concerned Cit.

ACC-2

Acra Inc.

Advisory Board for National Parks

GRAZ-1; REC-1

American Endurance Ride Conference

REC-8

American Horse Council

REC-1, 8

American Lands Access Association, Inc.

American Lands Alliance

GRAZ-5

American Motorcyclist Association

ACC-2, 11

American Rivers

BIO-12; WAT-4; WSR-1, 6

Animal Protection Institute

ACC-1, 10; BIO-1; GEN-1, 5; GRAZ-3; REC-2, 10;

WSA-3

Arctic Connections

GEN-7, 8, 22; WAT-4; WSA-3

The Association of Guides Within the Monument

REC-1, 3, 4

Back Country Horseman of Oregon

REC-8

Back Country Horseman of Utah

ACC-7; BIO-1; REC-1

Back Country Horseman of Utah, Mt. Ridge Unit

REC-8

Back Country Horsemen of America

REC-1

Back Country Horsemen of Nevada

REC-8

Back Country Horsemen of Utah

ACC-7; BIO-1; REC-1

Back Country Horsemen of Utah, Washington Chapter

ACC-7; REC-1

BLM Lands Foundation

ACC-1, 5, 9, 10; REC-12, 16, 19

Blue Ribbon Coalition

Bond Energy

ACC-1; BIO-4; GEN-1; GRAZ-5; WSR-1

Boss Company

GEN-2; REC-1

Boulder Mt. Ranch

Boulder Outdoor Survival School

ACC-5, 8; GEN-2; REC-1, 3, 18

The Boulder Regional Group
ACC-1; BIO-4, 9; GEN-1, 5; GRAZ-3;
LAND-1; REC-1, 2; WSR-6
Boy Scouts of America/Panguitch
District
REC-1
Boy Scouts of America/Paria River
District
REC-1
Bullhead 4 Wheelers, Inc.
California Native Plant Society
GEN-1; REC-2; WSA-2
Californians for Utah Wilderness
ACC-1, 10; GEN-11, 26; GRAZ-3;
REC-2; WSA-3; WSR-1
The California State Horsemen's
Association
REC-8
Campbell Scientific, Inc
GRAZ-3; REC-2
Canyon 4X4 Club
ACC-2
Canyon Country 4X4 Club
Castlerock 4 Wheelers
ACC-7, 10
Center for Environmental Connections
GRAZ-1; REC-2
Chequamegon Audubon Society
GRAZ-3; REC-2
Citrus Horse Trails Alliance
REC-8
Cline Library
GRAZ-1
The Cobb Land Trust
Colorado Association of 4 Wheel Dr.
Clubs, Inc.
ACC-2, 6, 9, 14, 15; REC-1; WSA-3
Colton 4-Wheelers Jeep Club &
Concerned Citizens
ACC-10
Conoco, Inc.
GEN-7, 8, 22, 36
Creeper Jeepers Gang
ACC-2, 10
Deer Creek Ranch Property Owners
ACC-18; LAND-1

Deer Springs Ranch
ACC-12
Deer Springs Ranch Owners
Association
ACC-12
Department of Agriculture, State of
Utah
GEN-1; GRAZ-5
The Desert Protective Council, Inc.
ACC-1; REC-2; WSA-2
Desert Survivors
GEN-1; GRAZ-1; REC-2; WSR-1
Dinaland Snowmobile Club
Ecology Center of Southern California
GRAZ-3; REC-2
El Dorado Equestrian Trails Foundation
REC-8
Endurance Riders of Alberta
REC-8
Escalante Canyon Outfitters
ACC-1, 5, 8; REC-1, 3, 8
The Escalante Center
ACC-5, 6, 10, 24; GEN-13, 30;
GRAZ-3, 5; REC-1, 4, 8, 10, 19
Escalante Wilderness Institute
ACC-1, 10; BIO-4; GEN-5, 12;
GRAZ-3, 6; LAND-1; REC-8;
WSR-1
Falcon Realty and Development Corp
Five County Association of
Governments
ACC-10, 20; BIO-4, 5; GEN-1, 2, 9,
11, 12, 13, 15, 16, 36, 38, 39, 41, 42,
43, 44, 45; LAND-1, 4, 5; REC-1, 8,
10, 17, 18; WAT-1, 2, 5, 6; WSA-2;
WSR-3
Flood Canyon Ranch
GEN-1; GRAZ-5
Forest Guardians
GEN-1; GRAZ-3; REC-2
Forests Forever
GRAZ-3
Foundation for North American Wild
Sheep
GEN-1
Friends of the River
WSR-1

Garfield County
ACC-3, 6, 9, 10, 12, 13, 15, 16, 20, 21,
22, 23, 24, 25, 28; BIO-5; GEN-1, 7, 9,
13, 15, 22, 33, 36, 37, 38, 39, 42, 43,
44, 45, 46, 48, 52, 53; GRAZ-7;
LAND-1, 3, 5; REC-1, 4, 10, 12, 19,
25; WAT-4, 8; WSA-2, 3; WSR-1, 3
Garfield County Engineer
ACC-9, 10, 12, 13, 14, 16, 21, 24, 27,
28; BIO-5; GEN-1, 5, 6, 7, 30, 32, 36,
48; REC-1, 7; WSR-3
Garfield County Planning Commission
and Town
ACC-20; BIO-4; GEN-15, 36, 38;
LAND-1; REC-17
Garfield County Travel Council
ACC-2; GEN-9
Garfield-Kane Grazing Advisory
Committee
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Garkane Power Association
ACC-5, 12; GEN-13, 40; LAND-1, 3, 5
Georgia Bounty Runners 4WD Club
Georgia State, Lieutenant Governor
Grand Canyon Trust
ACC-1; BIO-4, 5; GEN-1, 12, 24, 30;
GRAZ-5; LAND-1; REC-8; WAT-2;
WSR-3
Grand Canyon Wildlands Council
ACC-1, 10; BIO-4; GEN-1, 5, 11, 13,
24, 49; GRAZ-3, 7; WAT-1; WSA-3;
WSR-1
Grand Staircase-Escalante Outfitters &
Guides
ACC-5; REC-1, 3
Great Old Broads for Wilderness
BIO-4, 8; GEN-21, 24, 26; GRAZ-3, 5,
8; WAT-2, 5; WSR-7
Great Western Trail Assoc., Arizona
Council
Hereford Natural Resource
Conservation District
High Country Citizens' Alliance
ACC-1; GEN-1, 5
Hondo Rivers and Trails
REC-1

The Honeymoon Trail Company
REC-1
Humane Society of Utah
BIO-2; GEN-1, 17; REC-9
Independent Montana Miners
International Mountain Bicycling
Association
REC-12, 19
Iron County Commission
GEN-13, 15
The Izaak Walton League
GRAZ-1; REC-2
JHA Environmental Consultants, LLC
ACC-3; GEN-11
Kane County Sheriff's Office
Kane County
ACC-5, 7, 11, 20; BIO-4, 9; GEN-1, 2,
9, 13, 25, 30, 36, 42, 45; GRAZ-3, 7;
LAND-1, 3, 5, 6; REC-1, 8, 10, 16, 19;
WAT-5; WSR-3
Kane County Advisory Council
ACC-20; GEN-13; GRAZ-3, 5
Kane County Soil Conservation District
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Kane County Water Conservancy
District
GEN-41; WAT-7; WSR-3, 10
Kaniksu Bioregional Council
GRAZ-3; REC-2; WSA-3
Kerncrest Audubon Society
GRAZ-3
Kettle Range Conservation Group
ACC-1; GEN-1; GRAZ-1; REC-2;
WSA-2
Kiava Plateau Archeology
GEN-15
Klamath Alliance for Resource &
Environment
Lake Tahoe Hi-Lo's
Land & Water Fund of the Rockies
BIO-4, 8; GEN-21, 24, 26; GRAZ-3, 5,
8; WAT-2, 5; WSR-7
Land Rover Owners Association of
North America
ACC-10
Las Vegas Distance Riders Club, Inc.

Leland Haws Cattle Co. ACC-5; GEN-1, 13; GRAZ-5; REC-1	Outlaw Trail Endurance Arabians & Historical Ride REC-1, 8	Sierra Club ACC-1, 18; GEN-1; GRAZ-5; LAND-1; REC-2; WAT-4; WSA-3	Town of Boulder, Utah ACC-5; GEN-9, 42; LAND-5; REC-1, 2, 8
Lone Peak 4-Wheelers ATV Enthusiasts ACC-2, 10	PacificCorp ACC-5; GEN-8; LAND-3, 6, 7; WSR-10	Sierra Club, Grand Canyon Chapter WSA-3	Town of Circleville Town of Henrieville, Utah ACC-2; BIO-5; LAND-5
Long Island Off-Road Club Marinera Ranch REC-8	Pass Patrol 4X4 Travel Club People for the USA Project Bird Watch GRAZ-3; REC-2; WSA-3	Sierra Club, Rio Grande Chapter ACC-5; GRAZ-3; REC-2; WSA -3	Town of Jerome, Arizona Town of Kanab City ACC-10, 15, 20, 24, 25; GEN-1, 2, 13, 15, 42, 45; GRAZ-3; LAND-3, 5, 6; REC-1, 10; WAT-7, 8
Minnesotans for Responsible Recreation ACC-1; GRAZ-5; REC-2; WSA-2	Public Lands Foundation Rancho Racemosa REC-8	Sierra Club, Utah Chapter ACC-5, 8, 19, 24; GEN-32, 40; GRAZ-3, 5; REC-2; WSA-2, 3	Town of Page, Arizona Town of Springdale, Utah GEN-12, 22; WSR-6
Motorcycle Trail Riding Association ACC-10	Raptor Research Foundation ,Inc. BIO-2, 6	Sierra Student Coalition GEN-1; GRAZ-3; LAND-1; REC-2; WSR-1	Town of Toquerville, Utah ACC-2; BIO-4; REC-8
National Park Service/Utah State Office ACC-8, 10, 19; BIO-4, 8; GEN-1, 2, 5, 11, 12, 13, 36; LAND-1; REC-1, 2, 7, 8, 10; WAT-2	Red Rock Adventures, Inc. REC-1, 10	Skookumchuck Mud Daubers 4-Wheel Drive Club ACC-2	Town of Virgin, Utah ACC-2; BIO-9; REC-8
National Parks & Conservation Association ACC-1, 19; BIO-1; GEN-1, 5, 24, 47; GRAZ-5; REC-2, 10; WAT-4	Regional Parks Association ACC-1; GEN-1; REC-2	Small Pond Magazine SOG Investors, LLC GEN-7, 8, 22	Town of Washington City, Utah BIO-4; GEN-43; REC-8
National Wildlife Federation BIO-4, 8; GEN-21, 24, 26; GRAZ-3, 5, 8; WAT-2, 5; WSR-7	Republicans For Environmental Protection GEN-1; GRAZ-3; LAND-1	South Central Utah Telephone LAND-1	Travelers Aid Society Tule River Conservancy Graz-3
Natural Resources Defense Council BIO-4, 8; GEN-21, 24, 26; GRAZ-3, 5, 8; WAT-2, 5; WSR-7	Riverside Ruff Riders (Cal. 4 Wheel Assoc.)	South Eastern Utah Assoc of Local Governments	U.S. Department of Agriculture, Forest Service ACC-8, 18, 21; BIO-3, 4, 9; GEN-11, 33, 36
The Nature Conservancy BIO-7, 8	Rock Hoppers & Utah 4-Wheel Clubs Round River Conservation Studies ACC-1, 3, 5, 6, 10, 13, 24; BIO-1, 3, 4, 6, 8, 12, 14, 16, 17, 18; GEN-1, 7, 13, 21, 24, 31, 33, 43, 49; GRAZ-3, 5; LAND-1, 3; REC-8, 12, 19; WAT-2, 4, 5	Southern Utah Wildemess Alliance ACC-5, 8, 10, 13, 14, 18, 24; BIO-4, 6, 8; GEN-1, 5, 11, 12, 21, 22, 24, 26, 39; GRAZ-3, 5, 8; LAND-1; REC-1, 2, 18; WAT-1, 2, 4, 5; WSA-2, 3; WSR-1, 6, 7	U.S. Department of Energy GEN-36; LAND-1, 3
Nevada All State Trail Riders, Inc. REC-8	San Diego Off-Road Coalition ACC-9, 14, 15, 16; WSA-3	Southwest Four Wheel Drive Association ACC-9, 14, 15, 16; WSA-3	U.S. Environmental Protection Agency ACC-3, 4, 10; GEN-13, 22, 24; GRAZ-3; WSA-3
Nevada United Four Wheelers Association ACC-2, 10	San Juan County Commission Sandy 4-Wheelers ATV Enthusiasts Scenic America GRAZ-3; REC-2	Sport Utility Action Network ACC-9, 14, 15, 16; WSA-3	U.S. Fish and Wildlife Service BIO-1, 4, 8, 9; GEN-1; GRAZ-5; WAT-2
New Mexico 4-Wheelers ACC-2, 9, 14, 15, 16; WSA-3	Scenic Rim Trail Rides, Inc. REC-1	Sportsmen for Fish and Wildlife GEN-1	U.S. Wildlife Services GEN-1
New Mexico Touring Society GRAZ-3	Security Energy Company GEN-7, 8, 22	St. Anselm Exploration Company GEN-7, 8, 22	Uintah ATV Association Unitarian Universalists for Ethical Treatment of Animals GRAZ-3; REC-2
New Mexico Wildemess Alliance ACC-5; GRAZ-5; REC-2; WSA-2	Sequoia Forest Alliance GRAZ-3	Tennessee Citizens for Wildemess Planning GRAZ-3; REC-2	United Four Wheel Drive Associations ACC-9, 14, 15, 16; WSA-3
New York Botanical Garden GEN-22; GRAZ-5	Sequoia View Vineyards & Farm GEN-3	Timberline Trailriders, Inc. ACC-2, 10	Utah 4 Wheel Drive Association ACC-10
Oregon Association of Conservation Districts		Town of Big Water, Utah ACC-9	
Organization of Concerned Citizens ACC-13; GEN-1; GRAZ-3			

Utah Association of Conservation Districts
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Utah Associated Municipal Power Systems
LAND-1
Utah Community & Economic Development Team
ACC-2, 5, 6, 9, 10, 12, 13, 15, 20, 24, 25, 28; BIO-4, 9; GEN-11, 13, 15, 30, 36, 38, 39, 42, 45; GRAZ-3; LAND-1, 3, 5, 6; REC-1, 4, 7, 8, 10, 12, 17, 19; WSA-2; WSR-3
Utah Congressional Delegation (Chris Cannon, James Hansen, Robert Bennett, Orrin Hatch)
ACC-5, 10; BIO-4; GEN-42; REC-1, 8
Utah Environmental Congress
GEN-1
Utah Farm Bureau Federation
ACC-5; GEN-1, 7, 10; WAT-1; WSR-3
Utah Federal Gem & Mineral Society
ACC-10
Utah Shared Access Alliance
ACC-17; GEN-16, 37; REC-14; WSR-3, 4
Utah Snowmobile Association
Utah State Department of Transportation
ACC-25
Utah State House of Representatives - Thomas Hatch
ACC-2; BIO-4; GEN-1; LAND-1; REC-1; WAT-2
Utah State Governor's Office
ACC-4, 5, 6, 8, 10, 20; BIO-1, 4, 6, 13; GEN-1, 2, 10, 13, 15, 24, 30, 42; GRAZ-7; LAND-5, 8; REC-1; WAT-2, 4, 8; WSR-3, 6, 10
Utah Wild Project
ACC-8, 18; WSA-3
Virginia Horse Council Trails Committee
REC-8
Western Center for Envir. Decision-Making
REC-1

Western Center for Environmental Info.
The Western Counties' Resources Policy Institute
ACC-10; GEN-30, 43, 50; WSA-2
Western Horseman Magazine
REC-1
Western Utility Group
LAND-1, 3
Wilderness Medicine Institute
The Wilderness Society
ACC-1, 3, 5, 8, 9, 10, 14, 15, 18, 24; BIO-8, 12; GEN-5, 9, 11, 12, 13, 21, 22, 23, 24, 31, 32, 40, 51; GRAZ-1, 3, 5, 8; LAND-1; REC-12, 19; WAT-2, 4; WSA-1, 2, 3; WSR-1, 6
Wildlife Damage Review
ACC-17; GEN-1; GRAZ-1; LAND-2
Willow Creek Ecology, Inc.
ACC-3; BIO-4; GRAZ-1

INDIVIDUALS WHO COMMENTED

Abbott, Vance
Abel, Arthur
GRAZ-3
Abolafia, Andrew
Abrams, Alan
GEN-1
Abrams, Marti
REC-8
Achenla, Ray
Ackerman, Jim
Ackerman, John
GEN-2, 3; REC-2
Ackerman, S. David
Ackley, James and Ruth
Acton, Laurie
GEN-1
Adair, Neil
Adams, Ad
ACC-2
Adams, Byron
WSA-2
Adams, Cameron

Adams, Charles
ACC-13; GEN-1; GRAZ-3
Adams, Charles
ACC-13; GEN-1; GRAZ-3
Adams, Doug
GEN-1; GRAZ-3; LAND-1; WSR-1
Adams, George
Adams, Kurt
Adams, M.
Adams, Mary Jane
GRAZ-3; REC-2
Adams, Michael
ACC-2
Adams, Richard
Adams, Stan
Adams, Todd
Adams, Vance
Adams, Woody
Adamson, Keith and Christine
Adderley, Charles
Addy, Chris
GEN-1; GRAZ-1
Adelmann, Russ
Adey, Nils
ACC-1
Aengst, Peter
ACC-1; GEN-1, 5
Aeus, Kent
Agnello, Bob
ACC-2
Ahli, Mark
Ahmann, Shelly
Aiken, Rusty and Family
Ala, Kent
Albert, Diane
BIO-1; GEN-5; GRAZ-3; REC-2; WSA-2, 3
Alcock, John
GRAZ-3; REC-2
Alder, Steve
ACC-1
Alderson, Jay
ACC-10
Aldous, Steve
GRAZ-3; REC-2
Alexander, Andrew
ACC-1; GRAZ-5; REC-2

Alexander, Lauren
ACC-1; GRAZ-5; REC-2; WSA-3
Alexander, Sue
Alfred, Gregory
BIO-1; GRAZ-3; REC-2, 10
Alfred, Martin
GEN-1; REC-2
Alger, Rex
Alkire, Matt
Allan, Harry
Aldredge, Craig
Aldredge, Melanie
Aldredge, Nathan
Alleman, Frank
GEN-1, 13; GRAZ-5; WSR-3
Alleman, Kaye
GEN-1, 13; GRAZ-5; WSR-3
Alleman, William
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Allen, Duayne
Allen, Edward
GEN-1, 22; WSA-3
Allen, Frank
ACC-2
Allen, Fred
Allen, Greg
Allen, Janet
ACC-1, 5, 10; GRAZ-3; REC-2; WSA-2
Allen, Jennifer
Allen, Katy
Allen, Michael
ACC-10; REC-2
Allen, Ray
ACC-1; GRAZ-1, 3, 5
Allen, Sue
ACC-2
Allen, Von
Allerson Jennifer
ACC-1; GEN-1; GRAZ-3; LAND-1; REC-1; WSR-1
Alley, James Jr.
REC-8
Allin, Dave
ACC-6; GEN-2

Allison, Jan ACC-1; BIO-4; GEN-1, 5, 30; GRAZ-5, 6; LAND-1	Amodt, Gina BIO-4; REC-8	Anderson, Lincoln and Sheila REC-2	Apted, Lee GEN-1
Allison, P. ACC-13; GEN-1; GRAZ-3	Amster, Adolph GRAZ-3; REC-2	Anderson, Margery Anderson, Maurice ACC-10	Arbogast, Jim Arbuckle, Alan Arbuckle, Cameron
Allred, Clayton Allred, Danial Allred, Dick Allred, Doyle Allred, Eric Allred, Gary Allred, Kip Allred, William Almond, Donna REC-8	Anders, Mike ACC-5; GEN-5; WSA-2 Andersen, Dave Andersen, Lila Andersen, Quinn Andersen, V. Anderson, Alan Anderson, Amy Anderson, Blaine Anderson, Boyd Anderson, Bruce Anderson, Chris ACC-1 Anderson, Clifford GRAZ-1; REC-2 Anderson, Cody Anderson, Cookie ACC-1; GRAZ-3; REC-2; WAT-4 Anderson, Darrell and Barbara GRAZ-3; REC-2 Anderson, Daryl ACC-1; GRAZ-5; LAND-1; REC-2; WSR-1	Anderson, Monte Anderson, O. Robert Anderson, Randy GRAZ-1; REC-2 Anderson, Reed GEN-1 Anderson, Richard GRAZ-3; REC-2 Anderson, Russ GRAZ-3; REC-2 Anderson, Russell Anderson, Ruth Anderson, William Andrew, Robert Andrews, Aleda Andrews, Bob Andrews, Carol REC-8 Andrews, Chis GRAZ-5; WSA-3 Andrews, John Andrews, Michael GRAZ-3; REC-2 Andrews, Ryan Andrulis, Catherine GEN-1; REC-2	Archibald, Jason GEN-5; REC-1; WSA-2 Archibald, Keith and Judy ACC-1; GRAZ-1, 3, 5 Archtabel, Douglas Ardebie, Denise ACC-10 Argast, Gene and Karen Armstrong, John ACC-1; GRAZ-3; WSR-1 Aronow, Kurt GEN-1; GRAZ-3; REC-2 Arrington, Aubrey Ashcroft, Michael GRAZ-3; REC-2 Ashton, Melvin Ashworth, Gary Asmussen, Rodney ACC-13; GEN-1; GRAZ-3 Aspuru, Cristina GRAZ-5; REC-2 Aston, D. Athavale, Anjali, Neera and Vinayak ACC-10; GRAZ-3, 5; REC-2; WSA-3 Atherton, Robert REC-8
Alt, Stuart ACC-10 Alt, Doug Altman, Allen and Karin GRAZ-1; REC-2 Alvarez, F. Alvarez, Felicia Alvarez, Jose ACC-1; GEN-1, 2; REC-1, 10; WSR-1	Anderson, Gam Anderson, Gary Anderson, Glen Anderson, Gloria Anderson, Gregory Anderson, Jeff Anderson, Joyce and David REC-8 Anderson, Julie Anderson, Kathy ACC-1; GEN-1; REC-2 Anderson, Keith Anderson, Kenny ACC-2; GEN-13, 15; GRAZ-5 Anderson, Kent Jr. Anderson, Kent Sr. Anderson, Larry and Paula	Andrus, Eric Aney, Janaice REC-2 Angell, Elissa BIO-1; GEN-1 Angell, Fabio ACC-10; GRAZ-3, 5; REC-2; WSA-3 Angell, Kent Angenent, Tom and Virginia Aniello, Pete Anthony-Cahill, Spencer ACC-1, 5; REC-1 Antiel, Robert GRAZ-3; REC-2 Apostola, Nicole ACC-1; GRAZ-5; REC-2; WSA-3	Ashworth, Gary Asmussen, Rodney ACC-13; GEN-1; GRAZ-3 Aspuru, Cristina GRAZ-5; REC-2 Aston, D. Athavale, Anjali, Neera and Vinayak ACC-10; GRAZ-3, 5; REC-2; WSA-3 Atherton, Robert REC-8 Atkinson, Aaron REC-2 Atkinson, Tony Atwood, Maurice Atwood, Shirley Auclair, Charles August, Kenne Augn, Michael Ausburn, Don Austgen, Paul ACC-2 Austin, Kelly Avery, George GRAZ-3; REC-2 Avila, Janet Avila, Yadi
Alvey, Brent ACC-20; BIO-5; GEN-13; GRAZ-3, 5; REC-1 Alvey, Sam Alworth, Brian Amacher, Peter Amato, Nicole ACC-1; GRAZ-5; REC-2 Amaya, Yukiko Ambler, Anne ACC-5; GEN-5; WSA-2 Ambrose, Mike ACC-10; LAND-1; REC-2 Ambrose, James Jr. GEN-4 Amel, Dean REC-2; WSA-3 Ames, Carl			

Awalt, Charles
 GEN-1; REC-2
 Ayers, Mark
 BIO-1; GEN-5; GRAZ-3; REC-2;
 WSA-2
 Babbitt, Ken
 Bachman, Stefan
 ACC-1; GRAZ-5; REC-2; WSA-3
 Bachmann, M and M Thomas
 BIO-1; GEN-5; GRAZ-3; REC-2;
 WSA-2
 Bacso, Kenneth
 ACC-13; GEN-1; GRAZ-3
 Baden, Rita
 Badgett, Bob
 BIO-1; GEN-5; GRAZ-5; REC-2, 10
 Baer, Adam
 GRAZ-3; REC-2
 Baer, Cathy
 ACC-1; GRAZ-1, 3, 5
 Bagley, Charles Jr.
 REC-2
 Bailey, Greg
 Bailey, John and Jennifer
 Bailey, Mickey
 ACC-5; GEN-1, 13; GRAZ-5; REC-1
 Bailey, Tim
 Bailey, Tracy
 REC-8
 Baines, Darwin
 Baird, Kellee
 Baird, Robert
 Bajoravitch, Tori
 Bajpai, Anita
 Baker, Bruce
 GRAZ-1; REC-2; WSA-3
 Baker, Dan
 GRAZ-3; REC-2
 Baker, Gordon
 Baker, Michael
 GEN-1, 5; REC-1
 Baker, William
 ACC-1; BIO-5; GEN-1
 Balboa, Daniel
 Balding, Tom
 Baldwin, Martha
 REC-1

Baldwin, Roger
 Baldwin, Terry
 Balentine, John
 Bales, Arthur
 GRAZ-3; REC-2
 Ball, Nancy
 ACC-1; GEN-1; WAT-4; WSA-2
 Ballantine, A.
 GEN-1
 Ballantyne, Robert
 Banks, Jay
 Banks, Koltem
 Banks, Leane
 Banks, Lyle
 Banner, Meredith
 ACC-1; GEN-1
 Bannon, Barbara
 ACC-4; REC-2
 Banz, Samuel and Jenifer
 Barber, Blair
 Bardett, Matthew
 Barger, Steven
 GEN-5; REC-1
 Barkakati, Ivy
 Barkdull, Carenlee
 Barker, Carol
 REC-8
 Barker, Steve
 Barkume, Tom
 ACC-8
 Barlow, Al
 ACC-2; WSR-1
 Barlow, Danny
 Barlow, Laurie
 ACC-1, 13; GEN-1; GRAZ-3, 5;
 REC-2; WSA-2
 Barmettler, Bill and Patricia
 ACC-1; GEN-1, 5; GRAZ-1; REC-2;
 WSA-3
 Barnes, Keith
 GRAZ-3
 Barnett, Aaron
 Barnett, Brian
 GEN-1, 5
 Barnett, Ron
 Barney, Jim
 Barney, Robert

Bamson, Charolette
 ACC-2; GEN-13
 Barr, Gracia
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 Barrell, Jeff
 ACC-1; LAND-1
 Barres, Michael
 Barrett, Clotilde
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 Barrett, Duane
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 Barrett, Richard
 Barrett, Victoria
 Barringer, Debra
 ACC-10; GRAZ-3; LAND-1; WSA-3
 Barrus, E. Sherman
 Barstad, Ben
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 Bartelt, Claire
 ACC-1; GEN-1, 5; GRAZ-5; REC-2
 Bartelt, Thomas
 ACC-1; GEN-1, 5; GRAZ-3; REC-1, 2
 Barthel, John
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 Bartholomae, Charlene and Lee
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 Barton, Jeremy
 Barton, Lori
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 Barton, Neal
 Barton, Richard
 Barton, Scott
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 Bash, James
 ACC-1; GRAZ-5; LAND-1; REC-2;
 WSR-1
 Baska, Jai
 ACC-13; GEN-1; GRAZ-3
 Bassewitz, Ph.D Jon
 WSA-2
 Batchelor, Emma
 ACC-1; BIO-1; GRAZ-3; REC-2
 Bateman, Vesta
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Bates, Barbara
 ACC-10
 Bates, Bryan
 ACC-1; GEN-1; GRAZ-3; REC-2;
 WSA-2
 Bates Sammy
 Batey, Kate and Harry
 GEN-1; GRAZ-1; REC-2; WSR-1
 Battlalom, Gary
 Battle, Cullen
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 Bauer, Christopher
 Baufinson, Irene
 Bauhdadi, Sarah
 Baum, Mark
 ACC-1; GRAZ-5; REC-2; WSA-3
 Bauman, Dave and Sue
 Beach, Ben
 Beal, Scott
 Beales, Jean
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 Beales, Landon
 Bealle, Wallace
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 Beard, Chad
 Bearnson, Robert
 Beath, Mary
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 Beatty, Patrick
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 Beck, Dudley
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 Beck, Terry
 Becker, Alan
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 Becker, Andrew
 ACC-13; GEN-1; GRAZ-3
 Becker, Bobbie
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 Becker, Donald
 Becket, David

Beckett, Tom
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 Beckstrand, Robert
 Beckstrom, Chris
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 Beecher, Kurt
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 Beganie, Larella
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 Behan Jeff
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 Behunin, Marilyn
 Beleu, Steve
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 Belka, Lynn
 Bell, David
 Bell, David
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 Bell, George
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 Bell, Joleen
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 Bell, Kim and Tawnee
 Bell, Norton and Ann
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 Belliston, Tex
 Bellston, Brent
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Belsly, Elizabeth
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 Bement, Richard
 Bemus, Buddy
 Bench, Dan
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 Bender, Andy
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 Benedict, Jennifer
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 Benke, Janet
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 Bennett, Forrest
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 Bennett, James
 ACC-6
 Bennett, Wayne
 Bennett, William
 Benninghoff, Bruce
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 Bennion, Lee and Joseph
 ACC-1, 10; LAND-1; REC-2; WSA-2;
 WSR-1
 Bens, J.
 ACC-10
 Benson, Pamela
 Benson, Ralph
 Bentley, Berdell and Mary
 ACC-10
 Bentley, Ray
 Benton, Clayton
 ACC-13; GEN-1; GRAZ-3
 Berchell, Dixie
 Berenger, Bonnie
 ACC-1; GEN-1, 5
 Berg, Lynnae
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 Bergaman, Bob
 ACC-1; LAND-1; WAT-4
 Berge, Britta
 ACC-1; GRAZ-1, 3, 5
 Berger, Bruce
 Bergeron, Joe
 ACC-1; GEN-1; WAT-4; WSA-2

Berggren, Elizabeth
 GRAZ-3; REC-2
 Bergin, Terry
 Berkey, Elizabeth
 ACC-1; GRAZ-5; REC-2; WSA-3
 Berkowitz, Henry
 ACC-13; GEN-1; GRAZ-3
 Berlier, Todd
 Berling, David
 Berman, Michael
 GEN-7; GRAZ-1
 Berman, Patricia
 ACC-1; GEN-1, 5
 Bermond-Hamlet, Aude
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 Bernardo, Dolores
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 Bernardo, Sharol
 ACC-2; GEN-9, 13, 16
 Bernbaum, Bruce
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 Berner, Lynn
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 Berner, Murray
 WSR-1
 Bernet, Alex
 GEN-1
 Bernstein, Bud
 ACC-1; LAND-1; WAT-4
 Bernstein, Robert
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 Berry, David
 ACC-4, 10; GEN-7; GRAZ-1
 Berry, Kate
 ACC-1; BIO-1; LAND-1; REC-2
 Bertin, Pamela
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 Berto, Connie
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 Besser, Brian
 Best, David
 Best, Sat Sansar Singh
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 Beswick, Anya
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 Beutler, Henry
 Beweger, Gerogiana

Bezzant, Russ
 Bianchi, Peri
 Bible, Susan
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 Bickel, Harlow
 Bickford, Chris
 Bier, Chellney
 Bigelow, Boyd
 Bigelow, Paul
 Bigler, Robert
 Bigos, Martin
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 Bijones, Eugene
 ACC-1; GRAZ-1
 Bill, Gary
 ACC-1, 4; REC-2
 Billings, Deborah
 BIO-1; GEN-5; GRAZ-3; REC-2;
 WSA-2
 Bingham, Ken
 Bingham, Tad
 Binkley, Elizabeth
 ACC-13; GEN-1; GRAZ-3
 Binyon, Michael and Jean
 ACC-1; GRAZ-5; REC-2
 Birch, Darin
 Birch, Jack
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 Bird, Marsha
 Bird, Steve
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 Birkner, David
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 Biscoe, Jack
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 Bishop, Cory
 Bishop, Steven
 Bitter, Merrill
 ACC-1, 10; GRAZ-3; REC-2
 Bixby, Tai
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 Bjomstad, Ginger
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Black, Devon
 Black, Joseph
 Black, Keith
 Black, Larry
 Black, May
 Blackburn, Kathy
 Blackburn, Patsy
 ACC-2; BIO-1; GEN-1, 13; GRAZ-5;
 WSR-3
 Blackburn, Scott
 ACC-12; GEN-13
 Blackburn, Terry
 ACC-2; GEN-13, 15; GRAZ-5
 Blackett, Marlow
 Blackett, Tina
 Blackledge, Steve
 Blain, Richard
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 Blair, Robert
 ACC-2
 Blake, Bill
 ACC-1; GRAZ-5; REC-2; WSA-3
 Blake, John
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 Blake, Larry
 Blake, Linda
 Bland, Nancy
 GRAZ-1; REC-2; WSA-3
 Bland, Nancy
 Blar, Gaylen
 Blattenberger, Gail
 GRAZ-5; REC-2
 Blayyard, Clark
 Blevins, Darwin
 Block, Roxana
 Blodgett, Candice
 ACC-13; GEN-1; GRAZ-3
 Blohm, Cal
 Blommer, George
 ACC-14; BIO-1, 2, 4, 8, 13; GEN-1,
 12; WAT-6; WSR-3
 Bloom, Stuart
 ACC-13; GEN-1; GRAZ-3
 Blouch, Steve
 ACC-1, 5; GEN-5
 Bloyer, Jerusha

Blue, Jenny
 GRAZ-3; REC-2; WSA-3
 Bluhm, Jeff
 Blumenthal, Carol
 GRAZ-3; REC-2
 Blumenthal, Tom and Betsy
 ACC-13; GEN-1; GRAZ-3
 Boardman, Carolyn
 Boardman, Glennis
 BIO-5; GEN-13; REC-1
 Boeck, Jim
 GRAZ-1; REC-2
 Bogart, Douglas
 ACC-9, 14, 15, 16; WSA-3
 Bogart, Susan and Jeff
 Boger, Nikki
 Bogold, Becky
 REC-2
 Bogott, Fred
 Bohannan, Bill
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 Bohman, Verle and Renee
 Boland, Mike
 ACC-2
 Bolander, Bruce
 ACC-2
 Bolane, Christopher
 GRAZ-1; WSA-2
 Bolar, Marlin
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 Bolinder, John
 Bolinder, Ron
 Bollinger, Caralyn
 ACC-1; GRAZ-5; REC-2; WSA-3
 Bolsover, David
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 Bolton, Matthew
 Bondar, Eugene and Elsa
 BIO-1; GRAZ-5; REC-2, 10
 Bondar, Greg and Elisa
 BIO-1; GRAZ-5; REC-2, 10
 Bonham, Nicole
 Bonn, John
 Bonnell, Ann
 ACC-1
 Bonnicksen, Jon
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Bonweusch, Doris
 Boone, Lari
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 Boone, Tim
 ACC-9, 14, 15, 16; WSA-3
 Booth, Brian
 ACC-10; GEN-1; WSA-2
 Booth, David
 ACC-8, 10
 Boren, Bill
 Boren, Ryan
 Borg, John
 Borne, Michelle
 Borris, James
 ACC-2
 Borune, Allen
 Boss, David
 Bosworth, Ken
 Bott, J.
 Bottino, Paul
 Boune, Doyleene
 Bova, V. Arthur
 Bove, Clifford
 ACC-1; GEN-1, 2, 11; GRAZ-3;
 LAND-1; REC-2; WSA-1, 2; WSR-1
 Bowen, Nick
 Bowers, Ross
 Bowie, Michael
 Bowman, Jane
 ACC-1; GEN-5
 Bowman, Sylvia
 GRAZ-3; WSA-3
 Boyce, Joe
 Boyd, Elizabeth
 ACC-10; WSA-2
 Boyd, Wayne
 Boyd, Michael, M.D.
 GEN-1; GRAZ-1
 Boyer, Rick
 Boyle, Joseph
 ACC-1; GEN-1; GRAZ-1; LAND-1;
 WSR-1
 Bozeday, John
 Bradfield, Rod
 ACC-1; GEN-1, 5; WSA-2
 Bradford, Richard
 Bradley, Douglas

Bradley, Richard
 Bradshaw, John
 Bradshaw, Michael
 Bradshaw, Michael
 ACC-1; GRAZ-5; LAND-1; REC-2;
 WSR-1
 Brady, Irene
 ACC-1; GEN-1, 5; GRAZ-1; REC-2
 Brady, Susan
 ACC-2
 Bragg, Laurie
 GEN-5; REC-2; WSA-2
 Braithwaite, Alan
 Bramall, John
 Bramlett, Russell
 GRAZ-3; REC-2
 Brand, Rick
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 Brandlen, Julie
 BIO-1; GEN-5; GRAZ-3; REC-2;
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 Brandon, Leslie
 ACC-1; GRAZ-5; REC-2; WSA-3
 Branton, Gerald
 ACC-10; REC-2; WAT-4; WSA-2
 Brauner, Kalman
 ACC-1, 10; GEN-1; GRAZ-3; REC-2;
 WSA-2; WSR-1
 Bray, Gene
 ACC-1; GRAZ-1, 3, 5
 Breddan, Joe
 ACC-1; GEN-5; GRAZ-3; REC-1;
 WSA-3; WSR-6
 Bredeson, Craig
 ACC-13; GEN-1; GRAZ-3
 Breggs, Karen
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 Brehm, Susan
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 Brelish, Elizabeth
 ACC-1; GRAZ-5; REC-2; WSA-3
 Bremer, Roger
 ACC-13; GEN-1; GRAZ-3
 Brendle, Daniel
 ACC-1; GEN-1; WAT-4; WSA-2
 Brendle, Stefanie

Brendler, Candace	Bristol, Douglas	Brown, Larry	Buckley, Lauren
Brett, Richard and Lola	Britt, David	Brown, Laurene	ACC-13; GEN-1; GRAZ-3
GEN-1; GRAZ-3; LAND-1; REC-2;	ACC-5; GEN-12	ACC-20; BIO-5; GEN-13; GRAZ-3, 5;	Buckley, Sue
WSR-1	Broadbent, Steven	REC-1	ACC-1, 10; GEN-5; GRAZ-3; LAND-1
Brewster, Michael	Broadhead, Kathy	Brown, Mark	Bucolo, Brian
ACC-1; BIO-1; GEN-1, 5; GRAZ-3;	Broder, Melissa	ACC-13; GEN-1; GRAZ-3	GRAZ-5; REC-2
REC-2, 10	ACC-1; GRAZ-5; REC-2; WSA-3	Brown, Maud	Buff, Reenee
Brickey, Mike	Brody, J.	GEN-13	Bugni, Jefre
ACC-1; GRAZ-5; REC-2; WSA-3	Brookman, Gerald	Brown, N. Kelly	Buhler, Dean
Brickson, B.	GRAZ-3; REC-2	Brown, Randall and Cheryl	Buickerood, Jimbo
Bridges, Beu	Broonhead, Al	ACC-8	GEN-1; REC-1
Bridges, Charles	Brose, Dale	Brown, Richard	Buikett, Tanie
REC-8	Brose, Dan	Brown, Rick	ACC-2
Bridges, Jennifer	Brother, Liz	REC-2; WSA-2	Bulkey, Tery
REC-8	Brower, Ralph	Brown, Sara	Bullens, Darryl
Bridwell, Doug	Brown, Allat	Brown, Steve	GEN-5; GRAZ-3; REC-2; WSA-2
ACC-1; GRAZ-5; LAND-1; REC-2;	ACC-2; GEN-13, 15; GRAZ-5	ACC-13; GEN-1; GRAZ-3	Bullock, Kay
WSR-1	Brown, Barbara	Brown, Terry	Bullock, Lyn
Bridwell, Doug	ACC-1; GEN-5; GRAZ-5	ACC-1; GEN-1; LAND-1; WAT-4	Bullock, Scott
ACC-1; GEN-23; GRAZ-5; LAND-1;	Brown, Bill	Brown, Worth	Bunch, Van
REC-2; WSR-1	Brown, Blair	ACC-20; BIO-5; GEN-13; GRAZ-3, 5;	ACC-13; GEN-1; GRAZ-3
Brie, Shail	GEN-22; GRAZ-3, 5; LAND-1;	REC-1	Bundy, Clint
ACC-2; GEN-13, 15; GRAZ-5	REC-2; WSA-3	Brown, Mark M.D.	Bunker, Brad and Ann
Brienholt, Wally	Brown, Bruce	ACC-1; GEN-1; GRAZ-3; LAND-1;	Bunker, LeGrande
Briggs, Charles	ACC-1; GRAZ-5; REC-2; WSA-3	REC-2; WSA-2;	Bunting, Bruce
ACC-13; GEN-1; GRAZ-3	Brown, Bryan	WSR-1	ACC-5; GEN-1, 13; GRAZ-5; REC-1
Briggs, Karen	REC-2	Browne, Thomas	Bunting, DeRalph and Lynn
GEN-1	Brown, Carl	GRAZ-3; REC-2; WSA-3	ACC-10; GEN-36; WSR-3
Briggs, Neal	GEN-1, 5	Browning, Barbara	Bunting, Desarae
Bright, Ted	Brown, Clint	Bruke, Richard	ACC-5; GEN-1, 13; GRAZ-5; REC-1
GEN-1; WSA-2; WSR-1	Brown, Cory	ACC-1; GRAZ-5; REC-2; WSA-3	Bunting, Gavin
Brinda, John	Brown, Dave	Brunetti, David	ACC-5; GEN-1, 13; GRAZ-5; REC-1
ACC-5	Brown, David	ACC-13; GEN-1; GRAZ-3	Bunting, JoLynn
Brindle, Jayne	Brown, Drew	Brunvand, Amy	Bunting, Leah
ACC-1; REC-2	GRAZ-5; REC-2; WSA-2	ACC-1; WSA-2, 3	ACC-5; GEN-1, GEN-13; GRAZ-5;
Brink, Paul	Brown, Earl	Brush, Sara	REC-1
GRAZ-3; REC-2	Brown, Gay	Brustman, Thomas	Bunting, Vivian
Brinkerhoff, Chad	ACC-2; GEN-13, 15; GRAZ-5	ACC-13; GEN-1; GRAZ-3	Buoy, Bobby
ACC-2; GEN-13, 15; GRAZ-5	Brown, H. Kirk	Bryan, Wayne	Burak, Greg
Brinkerhoff, Ferrell	GEN-7, 8, 22	Bryce, Gretchen	ACC-13; GEN-1; GRAZ-3
ACC-17, 18; BIO-5; GRAZ-5; REC-1	Brown, James	GRAZ-1; REC-2	Burch, David
Brinkerhoff, Gay and Derik	Brown, James and Lau	Bryer, Elizabeth	ACC-1; GRAZ-3; REC-2; WSA-2
ACC-5; GEN-1, 13; GRAZ-5; REC-1	ACC-2; GEN-1, 13; GRAZ-5	BIO-1, 2; REC-2	Burchard, Ann
Brinkerhoff, Jeff	Brown, Jerry	Bryner, Gary	ACC-1; GRAZ-5; REC-2; WSA-3
Brinkerhoff, John	Brown, Jim	Buchanan, Bill	Burdick, Adam
Brinkerhoff, Shirley	Brown, Josh	Buchser, John	ACC-1, 13; GEN-1; GRAZ-3, 5;
Brinkerhoff, William	Brown, Kevin	ACC-1	LAND-1; REC-2; WSA-3 WSR-1

Burgener, Donald
 Burgess, Jeff
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 Burgon, Janell
 Burk, James
 Burk, Peter and Joyce
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 Burke, Marilyn
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 Burkert, Jay
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 Burkett, Teresa
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 Burkhart, Brooke
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 Burleson, Randy
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 Burnett, Bill
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 Burnette, Johnny
 Burnham, Bruce
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 Burns, Terry
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 Burns, Tim
 Burns, Victor
 ACC-13; GEN-1; GRAZ-3
 Burr, Bruce
 Burr, Phillip
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 Burraston, Kurt
 Burrell, Buzz
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Bush, Ken and Pat
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 Busk, Rodney
 Buskirk, Bill and Lynn
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 Buss, William
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 Buttar, Shahid
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 Button, Rhonda
 Button, Van
 Button, Wayne
 Buxton, Michelle
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 Bybee, Kyle
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 Bybee, Terrill
 Byrne, Dave
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 Byrne, Tom
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 C. de Baca, Teresa
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 Ca, Randy
 Cafaro, Philip
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 Cahill, Gerald
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 Cahoon, Alicia
 Cahoon, Beth
 Cahoon, Fred
 Cahoon, Richard
 Calderwood, Alan
 Calhoun, Julie
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 Call, Susan
 ACC-1; WAT-4; WSA-3

Callagan, Charles
 ACC-1; WSA-3; WSR-1
 Callister, Scott
 Cameron, Joe
 Cameron, Scott
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 Campbell, Janet
 Campbell, Julie
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 Campbell, Sharon
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 Cane, James
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 Canepa, Chester and Jackie
 Canfield, Kerry
 ACC-13; GEN-1; GRAZ-3
 Cannalte Doug
 GRAZ-3; REC-2
 Canning, Jerry
 ACC-5, 10
 Canning, Stephen
 GRAZ-3; REC-2; WSA-2
 Canning, Toni
 ACC-1; GRAZ-3; REC-2
 Cannon-Geary, Irene
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 Canoday, Edward
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 Car, Shane
 Cardella, Richard
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 Caripps, Kaye
 Carleton, Lee
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Carlson, Lorrie
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 Carlton, Floyd
 Carlton, JoAnn and Chris
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 Carman, Debbie
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 Carney, Eugene and Marilyn
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 Carpenter, Doyle
 Carr, David
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 Carriere, Nancy
 ACC-1; GRAZ-5; REC-2; WSA-3
 Carrigan, Allen
 Carrigan, Boyd
 Carrigan, Darin
 Carmociron, Joan
 Carroll, Mark
 Carroll, R.
 Carson, William
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 Carter, Ammon
 Carter, Brandon
 Carter, J.
 Carter, Jeffrey
 BIO-1, 8; GEN-5; GRAZ-3, 5; REC-2
 Carter, Larry and Dot
 ACC-1; BIO-4; GRAZ-5; WAT-2
 Carter, Lesley
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 Carter, Michael
 Carter, Scott
 Caruso, Ver Jean
 ACC-10
 Casbhuff, Gilbert
 Caspar, Cat
 ACC-1; GRAZ-5; REC-2; WSA-3
 Casper Dan
 Casper, Marvin
 Casperson, Rich
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 Cass, Brian
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 Cass, Robyn
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Cassady, Alison
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Castro, Rachel
Cates, Jeremy
Cates, JoEllen
Catton, Steve
WSA-2
Cavid, Harvy
Cazier, Andraya
Ceccardi, Toni
GEN-1; WSA-2
Cecil, Jon
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Cedar, Robert
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Cernac, Joe
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Cervasio, Darleen
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ACC-1; GRAZ-5; REC-2; WSA-3
Chailos, George
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Chamberlain, Bruce
Chamberlain, Cloyd
ACC-2; GEN-1; GRAZ-3
Chamberlain, Eric and Lucene
Chamberlain, Karen
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Chamberlain, Ron
Chamberlin, Susan
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Chambers, John
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Chambers, Reuece
Chambers, Sam
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Chambless, Michael
ACC-1; GRAZ-5; REC-2; WSA-3

Chamblin, Larry
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Chandler, James
Chandler, Ronald
Chappell, Bryce
Chappell, Charles
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Chappell, Gwen and Bryce
ACC-2
Chappell, Marion
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GRAZ-3; WSA-2, 3
Chase, Rebecca
BIO-1; GEN-5; GRAZ-3; REC-2;
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Chasnoff, Beth
ACC-1; GRAZ-5
Chatwin, Jared and Melissa
Chausse, Scott
ACC-1, 10; GRAZ-1; WSA-3
Chavez, Jodi
Chen, Allen
ACC-1; WAT-4; WSA-2
Cherry, Russell
Chester, Blair
Chiapella, Lynn
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Child, Connie
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Child, Neil and Regina
ACC-2; GEN-9; WSR-4
Child, Ron
ACC-10
Child, Sandra and Warren
Child, Sue
Childs, Nat
GEN-1
Childs, Ted
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Chizewsk, Nicholas

Chong, Michelle
ACC-1; GRAZ-5; LAND-1; REC-2;
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Chrestnos, A.
Christeansen, Steven
Christensen, Boyd
Christensen, Don
Christensen, Dorothy
GRAZ-5; WSR-4
Christensen, Elenore
Christensen, Eric
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Christensen, Gary
Christensen, Gordon
Christensen, Jay
Christensen, Jerry
Christensen, Mike
Christensen, Rex
Christensen, Robert and Mary
Christensen, Roger
Christensen, Scott
Christensen, Scott
Christensen, Sean
Christensen, Ted
Christensen, Todd
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Christenson, N.
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Finucane, Steve
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Fischer, Roxy
Fish, Jackie
Fish, James
Fisher, Carrie
Fisher, Dennis
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Fisher, Dennis
ACC-13; GEN-1; GRAZ-3
Fisher, Eric
Fisher, Erik
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LAND-1; REC-2
Fisher, James
Fisher, Kevin
Fisher, Kim
Fisher, Laura
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Fisher, Linda
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Fisher, Pete and Joanne
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Fite, Katie
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Fite, Richard
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Fitzpatrick, Eric
Fjelsted, Julia
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Flake, Victor
GRAZ-3; REC-2
Flanderka, Mary
ACC-1; GRAZ-5; REC-2; WSA-3
Flaumenbaum, Steve
ACC-1; GRAZ-5; REC-2; WSA-3
Fleming, Dan
Fleming, Lisa
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Flemmer, Linda
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Fletcher, Bryce
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Fletcher, Colin
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Fletcher, John
Fletcher, Larry
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Fletcher, Monica
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Flinchpaugh, Christopher
Flinn, Brian
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REC-2; WSA-2
Flinner, Matt
GRAZ-1
Floor, Jeffrey
ACC-5; REC-1
Floyd, Frederick
GRAZ-3; REC-2
Flynn, Roger
ACC-13; GEN-1; GRAZ-3
Fogarty, Pat
Fogelberg, Brent
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Fogelberg-Billette, Cheryl
GRAZ-5
Foley, William
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Folks, Dawn
Folland, Gerald
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Follett, Matthew,
ACC-1; GRAZ-5; REC-2; WSA-3
Follis, George
Fong, Mark
ACC-10; WSA-3
Fonger, Eugene
Fonken, Pete
ACC-1; GEN-1, 5
Fontenot, Donald
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Fonz, Ron
ACC-1; GEN-1; GRAZ-3; LAND-1;
REC-2; WSR-1
Forbes, Bruce
Forbes, Lynn
GRAZ-1
Forbes, Rob

Force, Mark
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Ford, Elbert
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Ford, Garrett
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Ford, JoAnn
Ford, Julie
Ford, Louie
Ford, Norman and Sheila
Ford, Roger
Fordham, Neoma
Forrester, Robert Jr.
GRAZ-5; REC-2
Forsyth, Tori
Fortin, Elizabeth
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Fortunato, Nik
ACC-1; GRAZ-5; REC-2; WSA-3
Foster, Dorothy
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Foster, Grace
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Foster, Jana
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Foster, John
Foster, Kyle
Foulger, Jeannie and Graydon
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Fowkes, Shawn
Fowler, James
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Fowles, Darryl
Fox, Jeff
Fox, Kyle
Fox, Leigh
GRAZ-3
Fox, Margi
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Fox, Mason
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Fox, Megan
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Foy, Bernard
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Francisco, Frank
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Francoeur, Cleve Jr.
Frandsen, Clay
Frandsen, Elden
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Frandsen, Jan
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Frandsen, Tracy
Frandsen, Richard
Frank, Daniel
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Frank, Paul
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Frantzen, Clark
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Fraser, Robert
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Freeman, Barbara
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Freeman, Carl
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Freeman, Dal
Freeman, Jim
Freeman, Margaret and Alan
Freeman, Nora
Frei, Landon
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French, Mike
Freund, Elizabeth
Freundlich, Craig
Frey, Scott
ACC-2; REC-14
Friant, Kent
Frichknect, Kay
Frick, Richard
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Friedemann, Bruce
GRAZ-1; WSA-2
Friederici, Peter
ACC-1; GEN-5

Friedman, Ann and Joe GRAZ-3	Gambill, Joan Gambino, James Jr. ACC-13; GEN-1; GRAZ-3	Genser, Richard and Claire GRAZ-3	Gillespie, Roger
Friedman, Bob ACC-10; LAND-1; REC-2	Gammell, B. Clyde	George, William GEN-5	Gillien, Heather REC-8
Friedman, Laura REC-8	Gano, David ACC-1	George, Tommy	Gillies, Von ACC-1
Friedman, Laurie	Gardner, Brian	Gerard, Jennifer	Gillispie, Scott
Friel, Robert	Gardner, Casey GRAZ-1	Gerber, Scott	Gilson, Betty, M.D.
Fries, Christopher ACC-13; GEN-1; GRAZ-3	Gardner, Kyle ACC-1; GEN-1, 5	Gemant, Jo Anne REC-8	Ginsburg, Joe ACC-1, WAT-4
Frisby, Charles	Gardner, Leo ACC-8	Gemer, Michael, Ph.D. ACC-1, 3	Giovale, Danny and Melissa ACC-4; GRAZ-1
Frohn, Joyce	Gardner, Mack	Gerrard, David	Gisler, John and Jan GEN-1; REC-2
Fronk, Eric	Gardner, Shaun and RaNae BIO-1; GEN-5; GRAZ-3; REC-10	Gerstein, Brad ACC-1; GRAZ-5; REC-2; WSA-3	Givens, David
Frooms, Linda GRAZ-1; REC-2	Gardner, Troy	Gersten, Carey GRAZ-3, 5; REC-2	Gjeming, Ame ACC-2, 10
Frost, Kit ACC-1; GRAZ-5; LAND-1; REC-2; WSR-1	Garmon, Jeff ACC-1; GRAZ-5; REC-2; WSA-3	Gettins, Kim	Glass, George ACC-2; BIO-4; REC-8
Frux, Gregory GRAZ-3; REC-2	Garon, Vemon REC-2	Gibbins, Gerald	Glass, Thomas
Fuller, Robert GEN-16	Garrett, K. A. ACC-13; GEN-1; GRAZ-3	Gibson, Ennis	Glazier, Byron and Roanna
Fulmer, Jared	Garrett, Larry	Gibson, Neal and Crystal BIO-1; GRAZ-3	Glazier, Greg GEN-1
Funk, Kenny	Garrett, Marjorie	Gibson, Norman	Glazier, Karen GEN-1
Furman, Mark ACC-2	Garrigan, Laura ACC-1; GRAZ-5; REC-2; WSA-3	Gibson, Pamela ACC-1; GEN-1; WSA-2, 3; WSR-1	Glazier, Kimberly ACC-2; GEN-1, 13; GRAZ-5
Furze, James and Pamela	Garthwait, Shirley and Howard	Giddings, Anthony BIO-1; GEN-1, 13	Glazier, Trent
Gray, Wesley ACC-10	Gartland, Chris ACC-13; GEN-1; GRAZ-3; REC-2	Gidner, Richard ACC-13; GEN-1; GRAZ-3	BIO-5; GEN-1, 13
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Gabriel, Tim ACC-1; GEN-23; GRAZ-5; LAND-1; REC-2; WSR-1	Gates, Pratt ACC-5; GEN-1, 13; GRAZ-5	Gigliotti, James ACC-13; GEN-1; GRAZ-3	Gleave, Andra
Gabrielse, D. Randall ACC-1; GRAZ-5; REC-2; WSA-3	Gault, Shelly GRAZ-3; REC-2	Gilbert, Barrie and Kathy ACC-1; GRAZ-1, 3, 5	Gledhill, David and Marla
Gaillard, Elaina ACC-13; GEN-1; GRAZ-3	Gavin, P.T.	Gilbert, Janet	Glen, Donald GEN-2, 5; GRAZ-3; REC-2, 8
Galbiati, Jim	Gayda, Gabrielle GEN-5	Gilbert, Kent	Glenn, Stephen ACC-1; BIO-4
Gallagher, Eileen GRAZ-3; REC-2; WSA-2	Gaydos, Bob	Gilbert, Tracy ACC-13; GEN-1; GRAZ-3	Glidden, Jock GRAZ-1; REC-2
Gallamore, Elveen ACC-2	Gaz, Gary	Gilbertson, Michael ACC-1; GRAZ-5; REC-2; WSA-3	Glover, Greg ACC-2
Gallamore, Howard ACC-2; GEN-1, 13, 15, 43, 44, 45; GRAZ-3, 5; LAND-1, 5; REC-8; WAT-2; WSR-3	Gebauer, Chris GEN-5; REC-1	Giles, Bill and Ann GEN-1; REC-1	Glover, Sherie GEN-1, 13; GRAZ-5
	Gelb, Richard GRAZ-3; REC-2; WSA-3	Giles, Joe	Goddard, Kendall
	Gendron, Joseph	Giles, John	Godley, Jim and Carrie
	Genles, Jeffrey	Giles, Kim	Goetsch, Matthew ACC-13; GEN-1; GRAZ-3
		Giles, Nathan	Goetz, Patrick ACC-13; GEN-1; GRAZ-3
		Giles, John Jr.	

Goetz, Scott
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Goggins, Alan
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Gokhale, Gauri
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Gold, Robert
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Goldberg, Caren
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Goldberg, Ron
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Goldhammer, David
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Goldman, Jeanne
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Goldschmidt, Karl
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Goldstein, Alexis
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Goller, Linda
ACC-1; GRAZ-5; REC-2; WSA-3
Gomes, Jerry and Pam
ACC-2
Gone, Jim
Gontrum, David
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Gonzales, Farrell
Gonzales, Henry
Gooch, James
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Good-de Lepper, Stormy
GRAZ-1
Goode, Mariah
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Gorby, Ryan
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Gordon, David
Gordon, Greg
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Gordon, Michael
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Gorman, D. Sr.
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Gorsetman, Mark
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Gose, Dave and Martha
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Gottfried, Donald
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Gottschalk, Joy
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Gould, John
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Gove, Walter and Antonia
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Gower, Steven
Goyer Nate
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Grace, Raymond
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Graff, Jan
Grah, Karen and Oliver
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Graham, Jim and Barb
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Graham, Mark
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Gralia, Ross
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Grasseschi, Michael
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Gravina, David
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Gravley, Monique
Gray, Gerald
Greco, Rick
Green, Doug
Green, Guy
Green, Joel
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Green, Robert
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Green, Roy
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Green, William
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Greenfield, Judy
Greenhalgh, Doug
Greenhalyh, Brad
Greenleaf, Allen
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Greenman, Jessea
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Greenstein, George
Greenwood, Kathy and Clyde
ACC-2
Gregerson, Juel and Amy
Gregory, Alan and Monica
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WSR-1
Gregory, Kelly
Gregory, William
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Grenersih, Molly
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Gridley, Darren
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Griffin, Clem
Griffin, Melonic
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Griffin, Randy

Griffith, Adam
Griffith, Erik
Griffith, Morrill
Griffiths, Jerry
Griffiths, Tad
Grisco, Mary
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Griswold, Stacy
Grizzell, Steve
Gro, Neldon
Groen, John
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Gromer, Ray
Groms, Tom
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Groo, Dallas
Gross, H
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Gross, Mathew
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Gross, Miriam
ACC-13; GEN-1; GRAZ-3
Grossman, Elizabeth
ACC-5; GEN-5
Grosz, Wayne
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Grover, Gary
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Grover, Ken
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Grubbs, Bruce
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Guerisoli, Bren
Guilford, Rhonda
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Gunderson, Bill
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Gunderson, Ed and Gisela
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Gunn, David
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 Gura, Nick and Catherine
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 Gurley, Steve
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 Guthrie, Alice
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 Guy, Richard
 Guynn, Peter and Caroline
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 Haag, Wyatt
 Haas, Duncan
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 Hafen, Kara
 Haggard, Ernest
 Hague, David
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 Hahle, John
 Hake, Buff
 Halama, Henry
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 Hald, Ken
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 Hale, Jon
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 Hale, Robert
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 Halford, Larry
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 Hall, Charles
 Hall, Clair

Hall, Donna
 Hall, DuReil
 Hall, Emily
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 Hall, Gary
 Hall, John
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 Hall, Jon
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 Hall, Joy
 ACC-1; GEN-1, 5
 Hall, Linda
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 Hall, Lorin
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 Hall, William
 Hallet, Jon
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 Halligan, David
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 Hallmark, Cullen
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 Hallows, Ted
 Halls, Kerry
 Halpern, Harvey
 WSA-2
 Halsey, Sean
 Hamed, Michael
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 Hamilton, Jack
 Hamilton, Joan
 ACC-1; GRAZ-5; REC-2; WSA-3
 Hamilton, Karen
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 Hamilton, Patrick and Norma
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 Hamilton, Warren
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Hammer, Joyce
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 Hammon, James
 Hammond, Keith
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 Hampton, Kristen
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 Hampton, Michelle
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 Hampton, Stephen
 Hance, Billie J
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 Hanchett, Brian
 Hancock, Coleen
 Hand, Stephanie
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 Handford, Art
 Handley, Vance
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 Handls, Kristine
 Hands, Kathy
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 Handwerger, David
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 Hannig, Gary
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 Hanrahan John
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 Hansen Adam
 Hansen, C. Clayton
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Hansen, Evon
 Hansen, G. Scott
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 Hansen, Jay
 Hansen, Jeff
 Hansen, Jerry
 Hansen, Karen
 Hansen, Kevin
 Hansen, Marc
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 Hansen, Michael
 Hansen, Ouay
 Hansen, Richard
 Hansen, Terry
 ACC-13; GEN-1; GRAZ-3
 Hansen, Vanoy
 Hanset, Donald
 Hanson, Eric and Arsenia
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 Hanson, Heath and Cheri
 Harbison, Candis
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 Hardekopf, Douglas
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 Harding, Brent
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 Hardy, Cindy
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 Hardy, Keith
 Hardy, Leo, Roberta, Ashley, Jessica
 and Jacob
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Harmon, Barbara	Hartog, Dale	Hawley, Steve	Heinman, Angela GEN-15
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Harms, Bobbie GRAZ-3; REC-2	Harvey, David ACC-13; GEN-1; GRAZ-3	Haws, Robert	Heiple, Tonya ACC-1
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Harold, Frank and Ruth GRAZ-1; REC-2	Harward, Velda	Hayes, Dave and Jeanette	Heltor, Ralph
Harper, George	Haskamp, Dale ACC-5; GEN-5; WSA-3	Hayes, III Charles	Hemingway, Dezi GRAZ-3; REC-2
Harper, Monte ACC-1, 10; GRAZ-3; REC-2; WSA-3	Haskell, Lee	Hayhow, Reid GEN-5	Hemingway, Jim
Harriman, Anne	Haslen, Glen	Haynes, Venna ACC-2; GEN-1, 13; GRAZ-5	Hemmon, Michael
Harris, Cathy	Hassell, Hank ACC-12; GEN-36; WAT-3; WSA-2	Haynie, Paul GEN-13; GRAZ-3, 5; LAND-1	Henderson, Bill ACC-2
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Harris, Jennifer	Hatch, J	Heaps, David	Henderson, Karen ACC-2; GEN-13
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Harris, Kim	Hatch, Kent	Hearst, Jay REC-1	Hendrickson, Mark
Harris, Neil and Pamela	Hatch, Mac	Heath, Charles	Heneri, Max
Harris, Roo GRAZ-3; REC-2	Hatch, Randy	Heath, Mike	Henrickson, Margaret ACC-1; GEN-22; REC-2; WSA-3
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Harris, Susan	Hatch, Ted	Heaton, Tamara ACC-10; GEN-22; GRAZ-3	Henrikson, Susan and Carl REC-2
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Harris, Laurence Jr.	Haultain, Sylvia	Heck, Larry	Henry, Bob Jr. ACC-1; GRAZ-5; LAND-1; REC-2; WSR-1
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Harrop, Blake	Hawes, Patty REC-8	Heil, Robert ACC-1	Heppler, Julee
Harsany, John	Hawkin, Robert	Heil, Rosemary ACC-1, 12; LAND-1; REC-2	Herbert, Jerry
Hart, David GEN-1; GRAZ-1; REC-2; WSR-1	Hawkins, Barbara ACC-1; GRAZ-5; REC-2; WSA-3	Heilpem, Slim ACC-5, 10; WSA-2	
Hart, Timothy ACC-1; GEN-5	Hawkins, Clyde		
Hartin, Kris ACC-1; GRAZ-5; REC-2; WSA-3	Hawkins, Edwin ACC-5; GEN-1, 13; GRAZ-5; REC-1		

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Herman, John ACC-3; GRAZ-3; WSA-1	Hills, B Hillson, Nyle ACC-9, 14, 15, 16; WSA-3	Hoffman, Ted REC-2	Holton, Jill GRAZ-5; REC-2
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Hermann, Matthew ACC-1; GRAZ-3; REC-2	Hinchey, Maurice ACC-1; LAND-1; REC-1; WSR-1	Hofftsen, Michael Hogan, Michael Hohenlohe, Paul ACC-1	Honer, Carolyn Honey, Bruce Hood, James ACC-1; GRAZ-5; REC-2; WSA-3
Herr, Brian	Hines, Cynthia GRAZ-5; REC-2; WSA-3	Hohmann, Russell ACC-2	Hook, C. ACC-2; GEN-13; GRAZ-5
Herrick, Shelly	Hingson, Dick ACC-10; GEN-5, 22; WSA-2	Holak, Andy ACC-1; GRAZ-5; REC-2; WSA-3	Hook, Lindsay ACC-2; GEN-13; GRAZ-5
Hertzberg, Scott ACC-1; REC-2	Hinkelman, Carol GRAZ-3; REC-2; WSA-2; WSR-1	Holbrook, Stephen Holcomb, Katherine Holcomb, Mike Holiday, Wayne	Hook, Lois ACC-2; GEN-13; GRAZ-5
Hess, Jimmy	Hinkins, Todd Hinote, Melodie ACC-2; GEN-13; GRAZ-3, 5; LAND-1	Holland, John ACC-1, 8	Hook, Penny REC-8
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Heydt, Nathan ACC-1; GRAZ-5; REC-2; WSA-3	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Hoopes, Greg ACC-10
Heyer, Raymond ACC-1; REC-2	Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Hopkins, Fred Hopkins, Ted and Arlene GEN-5; REC-2
Hicken, Beckey	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Hopper, Kay Hoppes, Greg Hoppus, Mike ACC-1; GRAZ-1, 3, 5
Hicken, James	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Hopwood, Doug Horgan, Chris Horn, Ronald ACC-1; GRAZ-3; REC-2
Hicken, Kerry	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Home, Susan REC-8
Hickman, Greg and MaryAnn GRAZ-3	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Homiog, Wayne Homyak, Jean GEN-1, 5; REC-1
Hickok, Brian GRAZ-3; REC-2	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Horowitz, Tina ACC-13; GEN-1; GRAZ-3
Hicks, Caroline GRAZ-3; REC-2; WSA-3	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	Horrocks, Garwin
Higgins, Scott ACC-13; GEN-1; GRAZ-3	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	
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Hill, Gese	Hintze, Jack Hintze, Jason Hintze, Larry Hirschi, Dennis Hirst, Wayne WSA-3	Hollander, Milton Hollberg, Steven Holley, Buddy Holley, Carole GRAZ-5; REC-2	
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Horrocks, Trevor	REC-2	Hungiker, Peggy	ACC-13; GEN-1; GRAZ-3
Horton, Paul	Huerta, Juanita	Hunnel, David and Heather	Ingraham, Blake
Horvitz, Bill	Huet, Douglas	ACC-2	GRAZ-3; REC-2; WSA-2
ACC-1, 5; REC-1	ACC-1; GEN-23; GRAZ-5; LAND-1;	Hunsaker, William	Ingram, James
Hoskisson, Paul	REC-2; WSR-1	Hunt, Alden	Irwin, Maria
GEN-1, 22; WSA-3	Huff, Blake	Hunt, Andrew	ACC-1; GRAZ-5; REC-2; WSA-3
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Hough, Manny	Huff, Alan	Hunt, George	Isreal, Douglas
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Houghton, David	Huffman, C	Hunt, Gordon	Iverson, Robert
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Housekeeper, Theora	Hugentoh, Mark	Hunt, Stephen	Ivins, Jason
Houser, Debra	Huggard, Dan	Hunt, Ty	Iwerks, Larry
REC-1	Huggard, Jamie	Hunter, Brad	BIO-1; GEN-1; GRAZ-1; REC-2
Houston, Dain	Huggart, M	ACC-2; GEN-13, 15; GRAZ-5	Jack, Kerin
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WAT-2	Hughes, Bill	Hunter, Lance	Jackson, Roger
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Howard, Harry	Hughes, Debra	Huntington, Lowell	GEN-2, 9, 13, 25, 36; REC-1, 8
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Howard, William	Hughes, Joseph	Huntsman, Casey	Jacobel, Robert
Howe, Eric	ACC-12, 17; ACC-2; BIO-5; GEN-13;	Huntsman, Dan	GRAZ-3; REC-2; WSA-2
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Howe, Gordon	Hughes, Keith	Hupp, Chet and Teri	Jacobs, Chris
ACC-1	Hughes, Kristine	Hurley, Robert	GRAZ-3, 5; REC-2
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REC-2	ACC-12; BIO-5; GEN-13; LAND-1	Hussey, Dixon	Jacobs, Lynn
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Howells, James	Hugie, Terry	Huthingson, Phillip	Jacobsen, Karon
WSA-1	Huhe, Robert	Hyman, Ruth	ACC-12
Howells, Mary E. M.	Hule, Durvis	GRAZ-5; REC-2; WSA-3	Jacobson, Chad
Howdsen, Freddie and Carolyn	ACC-13; GEN-1; GRAZ-3	Iabors, Ctristian	Jacobson, Danial
Hoyer, Eric	Hulet, Daniel	Imlay, K.	Jacobson, Robert
ACC-1; GRAZ-5; REC-2; WSA-3	ACC-7; GEN-40; WAT-4; WSR-3	Imlay, Valerie	Jagiella, Tom
Hoyt, Caren	Hullinger, Dennis	Imus Family	Jahn, Greg
ACC-5; GEN-1, 13; GRAZ-5; REC-1	Huls, Jeff	Inaba, Nancy	GEN-1
Hoyt, Wendell and Nellie	Hultquist, Ame	GRAZ-1	James, Tom
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Hubbard, Robert	ACC-13; GEN-1; GRAZ-3	Ingalls, Libby	Jansen, Ron
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Hubbard, Robert	GRAZ-5; LAND-1; REC-2; WSR-1		

Janson, Delmar ACC-10; GEN-1; GRAZ-3; LAND-2; REC-2; WSA-2	Jensen, Mark Jensen, Ned Jensen, Patrick Jensen, Paul Jensen, Payne Jensen, Ray Jensen, Scott Jenson, Emilie Jenson, Jodi Jenson, Randy ACC-2; GEN-13, 15; GRAZ-5	Johnson, Elizabeth GRAZ-1; REC-2 Johnson, Eric GRAZ-3; REC-2 Johnson, Floyd Johnson, Fred ACC-2; BIO-4; REC-8 Johnson, Georgia ACC-2 Johnson, Gerald GEN-1; REC-2 Johnson, Gerald Johnson, Glendon Johnson, Gordon Johnson, Grant ACC-8 Johnson, Hank Johnson, James Johnson, Janet REC-8 Johnson, Jaspem ACC-13; GEN-1; GRAZ-3 Johnson, Jeff Johnson, Jeffrey Johnson, John GRAZ-1; REC-2; WSA-3 Johnson, J Leo Johnson, Ken ACC-7, 10; WSA-3 Johnson, Kevin Johnson, Kim ACC-10; GRAZ-1; REC-2; LAND-1 Johnson, Kim Johnson, Kirk ACC-1; GRAZ-5; REC-2; WSA-3 Johnson, Larry Johnson, Laverna Johnson, Mary REC-2 Johnson, Matthew ACC-1; GEN-1; REC-2; WSA-3; WSR-1 Johnson, Michael Johnson, Michelle Johnson, Mike GEN-1; GRAZ-3; REC-2; WSA-3	Johnson, Moyle ACC-5 Johnson, Mr. and Mrs. Richard Johnson, N. GEN-5; WAT-4; WSA-3 Johnson, Paul ACC-1, 5; GEN-5; WSA-2 Johnson, Phillip Johnson, Richard REC-8 Johnson, Rick Johnson, Rick Johnson, Robert GEN-1; GRAZ-3; REC-2; WSA-2 Johnson, Rodger Johnson, Ronald REC-2 Johnson, Shauna ACC-2; REC-8 Johnson, Thomas ACC-1; GEN-1, 22; LAND-1 Johnson, Tim Johnson, Tim ACC-1, 13; GEN-1, 23; GRAZ-3, 5; LAND-1; REC-2; WSR-1 Johnson, Troy GEN-13; GRAZ-3 Johnson, Victor Johnson, Virginia Johnson, Aubrey Jr. ACC-1; GRAZ-1; REC-2 Jolin, Marc ACC-13; GEN-1; GRAZ-3 Jolley, Evan Jolly, David Jonath, Paul Jones, Allen Jones, Andrew GRAZ-1; REC-2; WSA-3 Jones, Andy ACC-2; GEN-1; REC-2 Jones, B. Jones, Bob Jones, Bob and Yvonne ACC-13; GEN-1; GRAZ-3 Jones, Carolyn
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Jump, Robert
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Kaas, Leslie
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Kahn, Jeffrey
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LaBarou, Brock
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Larkin, Michael
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Larkin, Steve
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LaRoche, Grant
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Larrabee, Edward
BIO-1; GEN-5; GRAZ-5; REC-2
Larrabee, Holly
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Larrabee, Jessica
ACC-2
Larrabee, Julie
Larrabee, Steve
ACC-2
Larsen, Byran
ACC-5; GEN-1
Larsen, Curtis
Larsen, Dennis
ACC-1; GRAZ-3; REC-2
Larsen, Franz and Patty
ACC-10
Larsen, Gary
Larsen, Helen
ACC-2; GEN-9
Larsen, Jerry
Larsen, Kent
Larsen, Neil
Larsen, Nils
ACC-1; GEN-1, 22; GRAZ-3; REC-2
Larsen, Randy
Larsen, Rebecca
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Larsen, Ronald
ACC-1, 5; GEN-1; GRAZ-3; REC-1, 2
Larson, Craig
GRAZ-5; REC-2
Larson, Darren
GEN-5; REC-1
Larson, Howard
Larson, Keith
Larson, Kris
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Larson, Myq
Larson, Samuel
Larsson, G. Scott

Larte, William
Lassen, Michael and Wanda
Lauer, Gregg
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Laufer, Ray
ACC-1; GRAZ-1; LAND-1; REC-2
Laughlin, Shawn
Lauren, Alie
ACC-1; GRAZ-5; REC-2; WSA-3
Lavagnino Remo
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Lavery, Daniel
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Law, Wesley
Lawrence-Skane, Melanie
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Lawson, Brian
ACC-1; GRAZ-5; REC-2; WSA-3
Lawson, Doris
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Laxar, Daniel
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Lay, Darwin
Leach, Dallin
ACC-18; GEN-1, 13
Leach, Dustin
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Leach, Ila
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Leach, Ken
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Leach, Nicky
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Leach, Robert
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Leach, Robert
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Leach, Travis
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Leach, Trevor
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Leachman, Mark
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Leautaud, John
Leaveck, Larry

Leavitt, Arnold	Lemer, Patti	Lien, David	Little, Jamie
Leavitt, Paul	ACC-1; GEN-5; GRAZ-1	ACC-13; GEN-1; GRAZ-3	ACC-5; GEN-1, 13; GRAZ-5; REC-1
Leavitt, Richard	Leston, Paul	Lighbum, Robert and Anne	Little, Karren
Leavitt, Steve	Letendre, John	ACC-1, 10; GRAZ-3	Little, Kenyon
Leboeuf, Armond	ACC-1, 10, 13; GEN-1; GRAZ-3;	Lilback, Kenneth	ACC-2; GEN-1; GRAZ-3
GRAZ-5; REC-2	LAND-1; WSA-2; WSR-1	ACC-13; GEN-1; GRAZ-3	Little, Lane
LeDuc, Michael	Leutwyler, Glenda	Lillywhite, Matthew	ACC-5; GEN-1, 13; GRAZ-5; REC-1
Lee, Gayle	REC-1, 8	Limbirt, Pat	Littlefield, S.
Lee, Gwendolyn	Levering, Ed	Lindberg, Rebekah	Livingston, Curt
BIO-1; GEN-1	REC-2	BIO-1; GEN-5; GRAZ-5; REC-2, 10	GRAZ-3; REC-2
Lee, John	Levin, Ross	Lindell, Dorothy	Lloyd, R.
GRAZ-1; REC-2	ACC-1; BIO-1; GEN-5; REC-2;	REC-8	Lloyd, Thomas
Lee, Kipp	WSA-2	Lindepod, Andy	Locey, Mary
GRAZ-3; REC-2	Levin, Steve	REC-1, 2	GEN-22
Lee, Lean	ACC-10; GRAZ-3; REC-2; WSA-2	Linderman, Curtis	Locker, Eric, M.D., P.A.
Lee, Russell	Levine, Elissa	ACC-13; GEN-1; GRAZ-3	GRAZ-3; REC-2
LeFevre, Barbie	ACC-13; GEN-1; GRAZ-3	Lindmark, Sid	Locklear, Alan
LeFevre, Dell	Levine, Ronald	GEN-5; REC-2; WSA-2	GRAZ-3; REC-2; WSA-3
ACC-5; GEN-1, 13; GRAZ-5; REC-1	Levy, Madelyn and Richard	Lindon, Matthew	Loeb, David
LeFevre, Leslie	GEN-1, 22; WSA-2	Lindsay, Dan	GEN-1; WSA-2
LeFevre, John	Levy, Norm	Lindsey, J. Page	Loeb, David
LeFevre, Reed	REC-1, 4	ACC-1, 5; REC-1	GEN-1; GEN-22; WSA-2
GEN-9	Lewin, Phillip	Linford, Duane	Loeb, Jason
Lefler, Susan	ACC-1, 10; GRAZ-3; REC-2	Linford, Fred	ACC-1; GEN-1, 5
GEN-7; GRAZ-1	Lewis, James	Ling-Mullins, Katherine	Loeb, Susanna
Legel, Pat	ACC-1; GEN-1; GRAZ-3; WSA-1;	Linton, Ronald	Loeoman, Carolyn
GRAZ-3; REC-2	WSR-1	Linwill, Rick	REC-8
Legendre, Thomas	Lewis, Lance	Lipman, James	Lofton, Harry
GRAZ-3; REC-2	ACC-5; GEN-1, 13; GRAZ-5; REC-1	GRAZ-3; REC-2	GEN-5; REC-2
Lehmann, David Jr.	Lewis, Luann	Lipmanson, Don and Joy	Loftus, Robert
Lehr, David	Lewis, Marjorie	GRAZ-3; REC-2	Lohmeier, Henry
Lehrman, Leslie	ACC-1	Lippard, Chris	Lombard, Johanna
ACC-1; GRAZ-5; REC-2; WSA-3	Lewis, Sam	ACC-5; GEN-5; WSA-2	ACC-1; GEN-1, 5, 22; WSA-2
Leigh, Blade	Lewis, Shawn	Lippert, John	London, Robert
Leister, Leslie	Lewis, Stephen	GRAZ-1; REC-2	GRAZ-3
GRAZ-3; REC-2; WSA-3	GRAZ-3	Lippman, Steve	Long, Bill
Leizle, Earl	Leydsman, E. Kim	ACC-1; GEN-1; GRAZ-3; LAND-1;	ACC-1
Lemke, Charles	Lezette, Janelle	REC-2; WSA-3; WSR-1	Long, David
Lemke, Melvin	Libengood, Ann	Lips, Chalo	Long, Emie
Lemon, Ronald	ACC-2	Liscom, Linda	ACC-1; GRAZ-3; REC-2
Leno, Michael	Licciardi, Yvonne	GRAZ-5	Long, John
Lenz, Dennis	ACC-1	Lisiewski, Christine	GEN-1; GRAZ-3; REC-2
ACC-1; GRAZ-5; LAND-1; REC-2;	Lichtenstein, Gary	ACC-1; GEN-1; GRAZ-3	Long, Kathrynne
WSR-1	ACC-1; GEN-5	Lister, Wayne Jr.	Long, Randy
Leonard, Hal	Lieben, Dave	Littell, Todd	Long, Steven
Leondires, Mark	Liebman, Joan	ACC-1; GEN-23; GRAZ-5; LAND-1;	Longson, Barbara
GEN-1	Liechty, Doug	REC-2; WSR-1	

Loniak, Walter
 GRAZ-3; REC-2
 Loomis, Carol
 ACC-1
 Looser, Mark
 Loosli, Joel
 Lord, Lynwood
 Lorence, Leonard
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 Lorton, Molly
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 Loser, Tim
 Lott, Anthony
 GRAZ-5; REC-2; WSA-3
 Louder, Betty
 ACC-1
 Louise, Kattiana
 ACC-1; GRAZ-5; REC-2; WSA-3
 Love, William
 GEN-1; GRAZ-3; REC-2; WSA-3
 Loveless, Bruce
 Loveless, Greg
 Loveless, Jesse
 Low, Jeff
 GEN-5; REC-1
 Low, Susan
 ACC-10
 Lowery, Tom
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 Lowrance, David
 ACC-1
 Lucas, Kara
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 Lucas, Laird
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 Lucas, Lawrence
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 Lucas, Mark
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 Lucas, Beth
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 Luedecke, Alison
 ACC-13; GEN-1; GRAZ-3
 Lueders, Edward
 ACC-10; GRAZ-5
 Luke, Leora

Lukens, Paul
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 Lukes, Rodney
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 Lundahl, Miles
 ACC-1, 10; GRAZ-3; REC-2; WSA-3
 Lundin, Aaron
 Lunt, J. R.
 GRAZ-3; REC-2
 Lupetin, Guerino Jr.
 GRAZ-5; LAND-1; REC-2; WSR-1
 Lussier, Christine
 ACC-1; GRAZ-5; REC-2; WSA-3
 Lut, Drew
 Luttrell, Mark
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 Lutz, John
 Lyman, Clisbee
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 Lyran, Willie
 MacFarlane, Bruce
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 Mack, Bobby and Carolyn
 Mackelsprang, Roy
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 MacKenzie, Doug
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 Mackey, John
 MacLaggan, Andrew
 ACC-13; GEN-1; GRAZ-3
 MacLaren, Gary
 MacNulty, Joy

MacRay, David
 Madden, Cher
 ACC-10
 Maddox, John
 Madsen, Chris
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 Madsen, Lee
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 Madsen, M
 Maestors, Denis
 Magleby, Kirk
 Magnuson, Launie
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 Maher, Lee
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 Mainland, Edward
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 Maino, Michael and Michaeline
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 Maisonpierre, Michael
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 Majewski, Glen
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 Major, Lisa
 ACC-1; GRAZ-5; REC-2; WSA-3
 Majors, Alexa
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 Makarick, Lori
 ACC-13; GEN-1; GRAZ-3
 Malavenda, Peter
 Malen, Kari
 ACC-1
 Malkin, Catherine
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 Malley, Christopher
 Malone, William
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 Maloney, Casey
 Maloney, Ken and Julie
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 Maninger, Sarah
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 Mansfield, Donald
 Manskopf, Dirk
 Manvel, Evan
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 Mnymules, Jayson
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 Manzi, Aline
 Manzo, Mitchell
 ACC-1; GRAZ-5; REC-2; WSA-3
 MaQuarrie, Marty
 ACC-7
 Marchun, Brian
 Marcus, Barbara
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 Maree, Gary and Karla
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 Maret, Jack
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 Marinelli, Bamey
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 ACC-1; GEN-1, 5
 Mark, Robert
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 Markeloff, Richard
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 Marks, Richard
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 Marlatt, Jeanne
 WSA-2
 Marler, Dewey
 Marotta, Caroline
 ACC-10; WAT-4; WSA-2
 Marquardt, Steve
 Marquis, Aleura
 Marquis, Kaylee
 Marquis, Pam
 Marquis, Roberta
 Marquis, Steve

Marrham, Travis	Masvr, David	Mayers, Margaret	McCleary, John
Marsh, Wim	ACC-1; GEN-1; WAT-4	ACC-5; GEN-1, 13; GRAZ-5; REC-1	McCleave, Julie
GRAZ-5; REC-2	Mathews, David	Mayes, David	ACC-13; GEN-1; GRAZ-3
Marshall, Gwen	BIO-5; REC-1	GRAZ-5; REC-2	McClellan, Danny
ACC-1, 10; GRAZ-1; REC-2; WSA-3	Mathews, Dillon	Maynard, Paul	McClellan, H.
Marshall, Jon	REC-1	REC-8	McClellan, Sandra
Marshall, Loren	Mathews, Trent	McAfee, Mary and Chuck	McClellan, Velyn
ACC-10	Mathie, Gordon	GEN-1; GRAZ-3, 4; WSA-3	McClendon, Mike
Marshall, Michael	ACC-10	McAllister, Diane	ACC-2
Martell, Craig	Mathis, Allyson	ACC-18; GEN-1; GEN-13	McCloy, Marjorie
REC-1	GEN-1; WAT-4; WSA-3; WSR-1	McAllister, Evan	GRAZ-3; REC-2
Martin, Andrew	Mathis, Ilse	GEN-1; GRAZ-3; WSR-3, 4	McCloy, Marjorie
ACC-1	REC-2	McAllister, Keith	McClure, Dayna
Martin, Ben	Mathis, Jeff	BIO-5; GEN-13	ACC-5; WSA-2
REC-2; WSA-3	GRAZ-3; REC-2	McAllister, Mark	McCollom, Jerome
Martin, Ben	Matson, Joan	McAllister, Ruby	ACC-1; GRAZ-5; REC-2; WSA-3
GRAZ-3; REC-2	Matsumoto, Sarah	ACC-10; GEN-22	McCord, Marilyn
Martin, Bennett	ACC-10; WSA-2	McAllister, Theo	ACC-13; GEN-1; GRAZ-3
Martin, Bill	Matthews, Christopher	McAllister, Zona	McCowan, Milo
Martin, Curtis	ACC-1; GRAZ-5; LAND-1; REC-2;	McAndrews, Pat	McCowin, Jarred
ACC-1	WSR-1	REC-8	McCoy, Elizabeth
Martin, Diane	Matthews, Greg	McArther, Douglas	WSA-3
ACC-5	Matthews, Jaxon	McArthur, Jim and Angie	McCoy, Gordon
Martin, Dianne	LAND-1; REC-2	McBath, Andrew	McCoy, Jay
REC-8	Matthews, Jonathan	ACC-1; GRAZ-5; REC-2; WSA-3	ACC-2
Martin, Jeffrey	ACC-13; GEN-1; GRAZ-3	McBride, Michael	McCoy, Jeff
GRAZ-3; REC-2	Matthews, Scott	McBride, Rebecca	GRAZ-1
Martin, Mike	Mattis, Michelle	ACC-13; GEN-1; GRAZ-3	McCoy, Katherine and Michael
Martin, Paul	ACC-13; GEN-1; GRAZ-3	McBride, S.T.	ACC-1, 10
Martin, Reed	Matula, Arthur	McCallan, Norma	McCoy, Ted
Martineau, Valerie	GRAZ-1; REC-2	REC-2	McCoy, Thomas
REC-8	Maugh, Colby	McCann, Alan	ACC-1, 13; GEN-1; GRAZ-3, 5;
Martinez, James	Maure, Frances	GRAZ-5; LAND-1; REC-2; WSR-1	LAND-1;
Martinez, Jason	GEN-1, 5	McCann, Gregory	REC-2; WSR-1
ACC-2	Mauren, Charles	ACC-13; GEN-1; GRAZ-3	McCracken, Neil
Marvel, Jon	Maurer, Richard	McCann, Sayles Alan	McCreary, Tom
ACC-1; GRAZ-1, 3, 5	ACC-1; GRAZ-1; LAND-1; REC-2	ACC-1; GEN-1; LAND-1; WSR-1	ACC-5; GEN-2; GRAZ-3, 5
Maslin, Mindy	Maxwell, Cody and Carl	McCarley, Donald	McCue, Frank
GRAZ-5; REC-2; WSA-3	Maxwell, Richard	McCart, Tracy	ACC-1; GEN-1; GRAZ-3; REC-1
Mason, Jeff	REC-8	McCarthy, Craig	McCue, Joyce
ACC-1	May, Sharon	McCarthy, John	ACC-1; BIO-4; GRAZ-5
Mason, Marty	ACC-1; BIO-1; GEN-5; GRAZ-3;	GRAZ-5; REC-2	McCue, Patrick
Massouh, Paula	REC-2	McCarvill, William	ACC-1; GEN-1; GRAZ-3; LAND-1;
GEN-1; LAND-1	Maycok, Melanie	ACC-1; GEN-1; GRAZ-1; LAND-2;	WSR-1
Masters, Michael	GRAZ-3	REC-8; WAT-2	McCullogh, John
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Masterson, Raymond	GRAZ-1; REC-7	ACC-2	

McCullough, Claire
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McCullough, Kathleen
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McDaniel, Larry
McDaniel, Melissa
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McDonald, Faye
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McDonald, Hollie
McDonald, Larry
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McDonald, S.
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McDowell, Terry
McElhaney, Dustin
McElhaney, Richard
McElhaney, Sharon
McElrea, David
McFarland, Brett
McFarland, Donald and Winnie
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McFarlane, Kurt
McFarlane, Sadie
McFetridge, Wayne
McGann, Donald
McGhee, Kate
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McGlinsky, Al and Lee
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McGovern, Tim
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McGrath, Jill
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McGuire, Matthew
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McGuire, Shanna
McHegh, Don

McIntire, Karen
ACC-10
McKay, Scott
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McKee, Dan
McKee, Norman
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McKee, Robert
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McKeighen, Daniel
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McKenney, Glen
McKenzy, Mack
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McKhann, Margie
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McKiman, David
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McKnight, Terry and Jana
McLain, Sue
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McLaughlin, Robert
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McLean, Matt
ACC-1; GEN-1, 5, 11; LAND-1;
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McMenoman, Michael
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McMichael, Malcolm
McMillen, Kevin
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McMillian, Laura
ACC-13; GEN-1; GRAZ-3
McMollough, Rayo
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McNair, Connie
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Meaucau, William
Mecham, A. Quang
Mecham, Brannon
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Mecham, Jerry
Mecham, Lowell
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Medford, Joan
ACC-10
Medford, Terry
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Medley, J. Kyle
Meeds, Debbie
Meeks, Graydon

Mehan, Dave
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Mehl, Harry
GRAZ-3; REC-2
Mehling, Chris
ACC-1
Meigs, James
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Mekolites, Edward
ACC-13; GEN-1; GRAZ-3
Mellard, Jonathan
ACC-13; GEN-1; GRAZ-3
Mellinger, J. Carl
Mellor, Reed
Melloy, Mark
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Memmott, Kelly
Menon, Gregory
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Merenda, Veronica
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Merges, Valerie
Merrell, Ted
Merrill, Chad
Merret, Graig
Meshek, Mike
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Messier, Bob
Messmer, Terry
Mesting, Cheua
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Meyer, Fred ACC-13; GEN-1; GRAZ-3	Miller, David GEN-5, 22	Millett, Elsmor	Mitchell, Albert
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Michniewicz, Ed GRAZ-5; REC-2	Miller, Dwayne	Millner, Stephen GRAZ-3; REC-2	Mitchell, Scott
Michniewicz, Edward ACC-13; GEN-1; GRAZ-3	Miller, Ernest	Mills, Mathew	Mitchell, Sherrie ACC-1; GRAZ-1, 3, 5
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Mihailov, Amy	Miller, Jenifer and Neil ACC-10; GRAZ-1; REC-2	Milner, Ernest	Mockler, Amanda GRAZ-3; REC-2
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Millard, Andrew ACC-13; GEN-1; GRAZ-3	Miller, Norm ACC-1	Mings, Latricia ACC-1; GRAZ-5; REC-2; WSA-3	Mofu, W. Mark ACC-5; GEN-1, 13; GRAZ-5; REC-1
Millard, Andrew ACC-10; GRAZ-3, 5; REC-2; WSA-2, 3	Miller, Ray	Minkin, Jordan ACC-1; GEN-1, 5	Mohle, James
Miller, Allen	Miller, Rob	Minks, Ron	Moiseyev, Maya GEN-1; GRAZ-3; WSA-3; WSR-1
Miller, Anna	Miller, Bob ACC-1; GRAZ-5; REC-2; WSA-3	Minter, Rosemary REC-1	Moler, Mary Ann
Miller, Bob ACC-1; GRAZ-1, 3; 5	Miller, Ronda	Minton, Charles GRAZ-3; REC-2	Molle, Jason
Miller, Bonnie REC-8	Miller, Sarah ACC-1; GRAZ-5; REC-2; WSA-3		Moller, L. Jack

Mone, Carol
WSA-2
Monkman, Jerry
ACC-1; GRAZ-5; REC-2; WSA-3
Mongris, Jerry
Monroy, Julio
Montemayor, Drusilla
REC-8
Montgomery, Paul
Moon, Blake
Moore, Andy
Moore, Barry
ACC-10; REC-2
Moore, Bill
REC-2
Moore, Billy
Moore, Charles
GEN-1; GRAZ-1; REC-2
Moore, Erin
ACC-1; GEN-1, 22
Moore, Frankie
REC-7
Moore, Gayle
ACC-2
Moore, James
ACC-13; GEN-1; GRAZ-3
Moore, Judith
ACC-13; GEN-1; GRAZ-3
Moore, Kitty
GRAZ-1
Moore, Lula
Moore, Rick
ACC-9, 14, 15, 16; WSA-3
Moore, Ryan
ACC-8
Moore, Wade
ACC-8; GRAZ-5
Moore, William
GRAZ-3; REC-2
Moot, Patric
Moraczewski, Jan
GRAZ-3; REC-2
Moretta, Keith
REC-1, 3
Morgan, Dave
Morgan, David
ACC-13; GEN-1; GRAZ-3; WSA-2, 3

Morgan, Martin
ACC-1
Morgan, Michael
ACC-1; GRAZ-5; REC-2; WSA-3
Morgan, Rosina
GEN-5; REC-1
Morgan, Sandra
ACC-1; GRAZ-5; REC-2; WSA-3
Morgenstein, David
Morgenthaler, R. D.
Morreale, Raphael
ACC-2; REC-1
Morrell, Christine
Morrill, Ruston
Morrill, Stan
Morris, Arlene
Morris, Daryl
Morris, Frank
Morris, Gary
GEN-1; LAND-1
Morris, Gregg
ACC-1; GRAZ-5; REC-2; WSA-3
Morris, Jim and Lori
Morris, Joy
ACC-1; GRAZ-1, 3, 5
Morrison, Brad
ACC-2, 10
Morrissey-Pulvers, Carrie Ann
ACC-13; GEN-1; GRAZ-3
Morse, Milo
Moseley, Carl
REC-2
Moseley, Charles and Marie
GRAZ-3; REC-2
Moser, Richard
GRAZ-1
Moskowitz, Lauren
Mosle, Daniel
Moss, Jacob
REC-1
Moss, Larry
GRAZ-3; REC-2
Moss, Perry and Joan
Mossman, Robert
GRAZ-3; REC-2
Mostek, Mr. and Mrs. Raymond

Motes, Preston Jr.
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Mott, Jenna
GRAZ-5; REC-2
Motter, Joe
GEN-5; GRAZ-1; WSA-3
Mount, Justin
GRAZ-3; WSA-3
Mount, Michael
Movsky, Rick
ACC-1; GEN-1; WSA-2
Moyers, Mitch and Laurie
ACC-5; GEN-1, 13, 16; GRAZ-5;
REC-1
Muelhauser, Steven
ACC-10; GEN-16
Mueller, Gerald
Mueller, Robert
GRAZ-1, 3; REC-2; WSA-3
Muir, Keith
Mujica-Crapanzano, Laura
Mull, Bill
GEN-1; LAND-1
Muller, David
ACC-1; GRAZ-5; REC-2; WSA-3
Mullin, Timothy Jr.
Mulrooney, Garrett III
GRAZ-5; REC-2; WSA-3
Mulvaney, Dustin
ACC-1; GRAZ-5; REC-2; WSA-3
Munger, Maynard
REC-8
Munk, Dave
GEN-1, 5
Munk, Jerry
Munson, Mavis
ACC-10; WSR-4
Munson, Robert
ACC-10; WSR-4
Murdock, Ken
Murdock, Todd
GEN-22
Murphy, Patricia
GEN-9; LAND-1; REC-1
Murray, Greg
Murray, Maureen

Murray, Michele
ACC-10; REC-2; WSA-2
Murraygreen, Ryo
GRAZ-3; REC-2
Mutel, Robert
ACC-10; GEN-5; WSA-2
Myers, Barbara
ACC-13; GEN-1; GRAZ-3
Myers, Mary
REC-8
Myers, Wanda
REC-8
Myers, Wayne
GEN-22
Myes, Rande and Helen
ACC-1; REC-2
Naftel, William, M.D.
REC-1
Nagengast, Derk
Nagler, Marilyn
GRAZ-1
Nagorka, Patricia
GRAZ-3; REC-2
Naille, R. Allen II
ACC-2
Natyle, Noah
ACC-1; GRAZ-5; REC-2
Neal, Amber
ACC-13; GEN-1; GRAZ-3
Nebeker, Darin, Lori, Jason, Jared,
Kyle and Becky
Nec, Shannon
GRAZ-5; REC-2; WSA-2
Nedeshy, David
Neehart, Mara
Neff, Reta
REC-2
Nefstead, Marjorie
ACC-1; GEN-1, 5, 11; LAND-1;
REC-2; WSR-1
Nefstead, Paul
ACC-1; GEN-1, 5, 11; LAND-1;
REC-2; WSR-1
Nehour, Bryant
Neilsen, Neil
Neilson, Jimmy

Neiman, Paul
ACC-1, 10; REC-2; WSA-2
Nelsen, Tom
Nelson, Brett
GRAZ-3
Nelson, Cynthia
GEN-1, 13; GRAZ-5
Nelson, Dan
Nelson, Dave
REC-2
Nelson, Dick
GRAZ-3; REC-2
Nelson, Don
Nelson, Elisa
ACC-13; GEN-1; GRAZ-3
Nelson, Garth
Nelson, Herbert and Mildred
GRAZ-3; REC-2
Nelson, Janet
ACC-1
Nelson, Jeffrey
Nelson, John
Nelson, John
Nelson, Karen
REC-8
Nelson, Karyn and John
GRAZ-3; REC-2
Nelson, Kristi
Nelson, Lonnie
Nelson, Scott
ACC-10; REC-2
Nelson, Tresa
Nericand, Rodney
ACC-2
Nesewich, Nancy
GEN-1; GRAZ-3; LAND-1; REC-2;
WSR-1
Nesta-Berry, Jean
ACC-13; GEN-1
GRAZ-3
Netuschil, Pamela
REC-8
Neunzert, Martin and Arleigh
GRAZ-1
Newbauer, Joanne
ACC-13; GEN-1; GRAZ-3

Newcomer, Joseph
REC-2
Newell, Christina
ACC-1; GRAZ-5; REC-2; WSA-3
Newell, Harry
ACC-3
Newell, Robert
Newfarmer, Terry
ACC-2
Newkirk, Lorraine
GEN-1, 5, 11; GRAZ-3; LAND-1;
WSR-1
Newman, Brownie
GRAZ-3
Newman, Dave
ACC-1; GRAZ-5; REC-2; WSA-3
Newman, Ezra
GEN-1; WSA-3
Newman, J.
ACC-1; GEN-1
Newman, Michael
GRAZ-3; REC-2
Newson, Valerie
REC-1, 8
Nguyen, Emily
Nice, Salim
REC-8
Nicholl, David
GRAZ-3; WSA-3
Nichols, Chuck and Judy
ACC-1, 10; GEN-5; GRAZ-1, 3;
REC-2
Nichols, Gary
WSR-6
Nichols, J.
ACC-1; GRAZ-5; REC-2; WSA-3
Nichols, Lyle
ACC-13; GEN-1; GRAZ-3
Nichols, Michael
ACC-13; GEN-1; GRAZ-3
Nichols, Nick
BIO-1; GEN-5; GRAZ-3; REC-2;
WSA-3
Nickell, Mr. and Mrs. Howard
Nickelson, Lee
Nickles, Duncan
Nicocondemos, Tim

Nielsen, Barry
ACC-12
Nielsen, Judith
Nielson, Donna
Nielson, James
Nielson, Jay
Nielson, Stephen
Nielson, Tom
Nielson, Tom and Sherece
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Niles, Kate
GEN-1; REC-2
Nilesen, Lowell
Nilson, Ralph
Ninnemann, John and Laura
ACC-10; REC-2; WSA-
Nishio, John
GEN-1; GRAZ-1; REC-2, 12
Nishwander, Ruth
GRAZ-3; REC-2; WSA-2
Nixon, Scott
Noble, Andy
Noirot, L. Deane and Neva
Nonnenna, Amy
ACC-1; GRAZ-5; REC-2; WSA-3
Norine, Jim
ACC-2
Norman, Jon
Norman, Judith
REC-2; WSA-2
Norris, James
ACC-20; BIO-5; GEN-13; GRAZ-3, 5;
REC-1
Norris, Susan and Kenneth
ACC-13; GEN-1; GRAZ-3
North, Glenn
Northrop, Clay
ACC-1; GRAZ-3; LAND-1; REC-2;
WSA-2
Norton, Daylan
ACC-1; GEN-1, 5
Norton, Judith
ACC-1; GRAZ-5; REC-2; WSA-3
Norton, Robert
ACC-16
Nostier, Mary Ann
Noteboom, Jim and Family

Noteman, A
ACC-2; GEN-1, 13; GRAZ-5
Noteman, Laurali
ACC-2; GEN-13; GRAZ-5
Noteman, Rhett
ACC-2; GEN-13; GRAZ-5
Notestine, Jim and Iris
GEN-1; REC-2
Novak, Lisa
ACC-13; GEN-1; GRAZ-3
Nowicki, Diane
GEN-5; WSA-3
Noyes, Weston
Numan, David
Nunn, Sarah
ACC-5; WSA-2
Nutting, John
Nye, Rich
Nyland, Bill
Nystrom, David
O'Brien, Bob
O'Brien, James Jr.
ACC-9, 14, 15, 16; WSA-3
O'Cannon, David
O'Connor, Kathryn
GEN-5
O'Donnell, Julie
ACC-1; GRAZ-5; REC-2; WSA-3
O'Donnell, Matt
ACC-1; GRAZ-5; REC-2; WSA-3
O'Dowd, Bill
O'Hara, Michael
ACC-1; GRAZ-5; REC-2; WSA-3
O'Herin, Buck
REC-2
O'Keefe, Thomas
ACC-1
O'Leary, Cathy
BIO-4; GRAZ-1
O'Malley, Lauren
ACC-1; GEN-1
O'Malley, Nancy
O'Mara, Philip
O'Neal, Denny
GEN-5; GRAZ-5
O'Neil, Lynn and Cindy
ACC-10; WSA-3

O'Neill, Eleni
 Oakley, David
 Oaks, David
 Oates, Doug
 REC-19
 Oatney, Steve
 Oberholtzer, John
 GRAZ-3; REC-2
 Oberto, Steve
 Oborn, Gordon
 Odell, Wesley
 ACC-5; REC-2; WSA-2, 3
 Oder, Danila
 GEN-22
 Oestreich, Dennis
 ACC-1; GEN-1, 5
 Ogden, Bryce
 Ogden, Darwin
 Ogden, Michael
 Oglesby, Dave
 GRAZ-3; REC-2
 Ohanian, Laura
 GRAZ-3; REC-2
 Ohendalski, David
 Ohlsen, William
 GEN-1, 22
 Okerlund, David
 Okerlund, Gail
 Okin, Greg
 Oldroyd, Candace
 Oldroyd, Gordon
 Oldroyd, Robert
 Oldroyel, Fran
 Oliver, Charles
 Oliver, Thomas
 ACC-1; GRAZ-5; REC-2; WSA-3
 Olivero, Michael
 GRAZ-1; REC-2
 Olsen, Brent
 Olsen, Connie
 Olsen, Darwin
 Olsen, David
 Olsen, David
 ACC-1; GEN-23; GRAZ-5; LAND-1;
 REC-2; WSR-1
 Olsen, Gary
 Olsen, Ken

Olsen, Marc
 GEN-23; GRAZ-3; LAND-1; WSR-1
 Olsen, Parry
 Olsen, Phillip
 Olson, Daniel
 Olson, David
 Olson, Kelly
 Olson, Lonnette
 REC-8
 Olson, Marc
 GRAZ-3; REC-2; WSA-3
 Olson, Marcus
 ACC-1; GRAZ-5; LAND-1; REC-2;
 WSR-1
 Olson, Stephen
 Olszta, Daniel
 GRAZ-5; REC-2
 Olyarnik, Suzanne
 ACC-1; GEN-1; GRAZ-1; REC-2
 Onks, Mary
 Oppenheimer, Jonathan
 GRAZ-1
 Orcholski, Gerald
 ACC-1; GEN-23; GRAZ-5; LAND-1;
 REC-2; WSR-1
 Ordal, Leslie
 ACC-1; GRAZ-5; REC-2; WSA-3
 Orgain, Peter and Carol
 GEN-1
 Orme, June
 GEN-5; GRAZ-3; REC-2; WSA-2
 Omdorff, Kim
 Orr, David
 BIO-1, 4; GEN-1; GRAZ-1; WSR-1
 Orr, Nancy
 GRAZ-3; REC-2
 Osborn, Julie
 GRAZ-3; REC-2
 Osborne, Michele
 GEN-1, 22; REC-2
 Oscarson, Ed
 Oss, Earl
 Osterhout, Jeff
 ACC-10; GEN-1, 5
 Ostler, Robinson
 Oswald, Fred
 ACC-1; GRAZ-1; REC-2

Oswald, Joyce
 BIO-1; GEN-5; GRAZ-3; REC-2;
 WSA-2
 Oswald, Lindsey
 ACC-5; GEN-22; REC-2; WSA-2
 Oswald, W. Wyatt
 ACC-10; WSA-2
 Oths, Kathryn
 GEN-1, 5
 Ott, Charlie
 ACC-1; GRAZ-1, 3; REC-2
 Ott, Ecko
 REC-1
 Ott, J. Robert
 ACC-2, 12, 17; BIO-5; GEN-13;
 LAND-1
 Ott, Kolter
 ACC-2
 Ott, Mira
 ACC-2, 12, 17; BIO-5; GEN-13;
 LAND-1
 Ott, Patricia
 REC-1, 2
 Ott, Richard
 Ott, Vickie
 Ottenberg, Marjorie
 ACC-1, 10
 Oveson, Paul
 Owchar, Ann
 GEN-1; GRAZ-3; REC-2; WSA-2
 Owen, Bessie
 ACC-1; WSA-2; WSR-4
 Owen, Jennifer
 GRAZ-3
 Owen, T.
 Owen, Langdon Jr.
 ACC-1; GRAZ-3; REC-2
 Owens, Barbara
 GRAZ-3; REC-2; WSA-2, 3
 Owens, Doug
 ACC-5; GEN-1, 13; GRAZ-5; REC-1
 Owens, Hunter
 ACC-1; WSA-2; WSR-1
 Owens, Lorin
 Owens, Mark
 Owens, Merrill
 Oxley, James

Pace, Ben
 Pace, Darren
 ACC-10; REC-2; WSA-3
 Pace, David
 Pace, Gordon
 Pace, Layne
 Pace, Rudolph
 ACC-2; GEN-13, 15; GRAZ-5
 Pack, Russell
 ACC-1; WSA-3
 Pace, Stephen
 GRAZ-1; REC-2
 Paentice-Dunn, Steven
 GRAZ-1; REC-2; WSA-3
 Page, Alan
 Pagen, Timothy James
 ACC-1; GRAZ-5; REC-2; WSA-3
 Pagenstecher, Walemar
 ACC-2
 Painter, Steve
 Painton, Larry
 GRAZ-3
 Palen, Howard
 Palfreyman, Clark
 REC-8
 Palley, Kenneth
 WAT-4; WSA-2
 Palm, Jason
 ACC-1; GRAZ-5; REC-2; WSA-3
 Palmblad, Ivan
 ACC-1; GRAZ-1, 3, 5
 Palmer, Elizabeth
 ACC-13; GEN-1; GRAZ-3
 Pamperin, John
 ACC-1; GRAZ-3; REC-2; WSA-2
 Pan, David
 Pana, Dave
 Pankow, Carolyn
 ACC-1; GRAZ-1, 5; REC-2; WSA-3
 Pankratz, Scott
 GRAZ-5; REC-2
 Panter, Adrienne
 ACC-5; GEN-5; WSA-3
 Papciak, Mike
 GRAZ-5; REC-2
 Pardee, Catherine
 ACC-13; GEN-1; GRAZ-3

Parish, MacDell	Patton, Kristen	Pen, Charles	Peterson, Bradley
Park, Brian	ACC-13; GEN-1; GRAZ-3	Penderey, Bruce	Peterson, Bradley
Park, Jen	Pau, Paul	ACC-1; GRAZ-1, 3, 5	Peterson, Dewain
Park, Robert	ACC-2; GEN-13, 15; GRAZ-5	Penhaligen, Charles	Peterson, Donald
ACC-13; GEN-1; GRAZ-3	Paull, Steven	ACC-13; GEN-1; GRAZ-3	ACC-1, 10; GEN-5; GRAZ-5; REC-2;
Park, Kimberly	GRAZ-3; REC-2	Pennart, Sherye	WSR-1
Parker, Andrew	Paulson, Diane	Penner, Michele	Peterson, Hillary
ACC-1	Pavord, Marcy and Tony	GRAZ-1; REC-2	GEN-5; GRAZ-3; WSR-1
Parker, Brandon	REC-1, 8	Penniston, Gregory	Peterson, Lori
Parker, Elaine	Pay, Clair	Perkins, Dale	ACC-10
REC-1, 8	Payne, Cory	Perkins, Ray	Peterson, Robert
Parker, Ellen and Ted	Payne, Dwight	REC-2	Peterson, Roger
Parker, John	Payne, Ray	Perkins, Leroy	ACC-5; GEN-29; WSA-2
GEN-1	GRAZ-3; REC-2; WSA-2	Perkio, Steven	Peterson, Rollo
Parker, Margaret	Pazich, Michael	ACC-2	Peterson, Steven
ACC-1	ACC-1; GRAZ-5; REC-2; WSA-3	Pero, Dominic	Peterson, Thomas
Parker, Tom	Pearson, Dave	Perri, Chris	GEN-13, 15; GRAZ-5
REC-8	Pearson, Dave	REC-2; WSA-3	Peterson, Troy
Parks, David	ACC-12; REC-2	Perri, Sedren	Petersons, The
ACC-1; GRAZ-3, 5; REC-2; WSR-1	Pearson, Mark	Perry, Hal	Peterson, Gerold
Parr, Ann	ACC-10; REC-2	Perry, Seth	Petite, Duane
REC-8	Pearson, Owen and Carol	ACC-1; GRAZ-5; REC-2; WSA-3	GEN-1; REC-8; WSR-1
Parrish, Linda and Kenneth	BIO-4; REC-8	Persons, Wayne	Petrich, Shirley
REC-8	Pease, Elizabeth	GEN-1; GRAZ-3; REC-2; WSA-3	GRAZ-3; REC-2
Parrish, Lye	GRAZ-1; REC-2	Petelle, Michael	Petrik, Anne and Gene
Parrish, Robert	Peay, Brad	GRAZ-1	Pettegrew, Daniel
GEN-5; REC-1	Pech, Nanaye	Petencin, Don	GRAZ-3; REC-2
Parry, Ronald	BIO-1	GRAZ-1	Pettit, Dan
LAND-1; REC-2	Peck, Henry	Peters, Wayne	ACC-1; REC-2
Parry, Scott	GEN-1; GRAZ-3; REC-2; WSA-2;	ACC-1	Pettit, Daniel
Parsons, Perry	WSR-1	Petersen, Birk	ACC-1; LAND-1; REC-2; WAT-2
Parsons, Randy	Peck, Mary and Maurice	Petersen, Doug	Pettit, Marie
ACC-2	Peck, Michael	Petersen, George	GEN-1; GRAZ-3; LAND-1; REC-2;
Parzych, Christopher	Pedersen, Megan	GRAZ-3; REC-2	WSA-2; WSR-1
ACC-1; GRAZ-5; REC-2; WSA-3	REC-1	Petersen, Les	Pettus, D. Lindsay
Pasekoff, Dorene	Pedersen, Preston	Petersen, Mike	Petty, Guy
ACC-10; GRAZ-3, 5; REC-2; WSA-3	ACC-2	GRAZ-1, 4	Pham, Phat
Patalik, Edward	Pedersen, Scott	Petersen, Peggy	ACC-10; GRAZ-3; WSA-3
GRAZ-4, 5; REC-18	Pedersen, Rex Jr.	Petersen, Rex	Phelps, Kelsey
Paterson, Charlie	Pederson, Joel	Petersen, Sue	ACC-7
ACC-10; GEN-1; REC-2	Pederson, Rovor	ACC-1; GEN-1; LAND-1; REC-2	Phillion, Jennifer
Patrick, Michael	Pedro, LaRee	Peterson, Alan	ACC-1; GRAZ-5; REC-2; WSA-3
Patten, Jane	Peck, Jerry	Peterson, Anna	Phillips, Robert
Patterson, Dennis	GEN-1, 22; WSA-2	GRAZ-3; REC-2	Piani, James
ACC-10	Peebles, Charles	Peterson, Anne	Piatt, Robert
Patton, Hi and Lois	Pelkey, Jo	GEN-1	ACC-1; GRAZ-5; REC-2; WSA-3
ACC-1; GEN-5; GRAZ-5; WSR-1	ACC-13; GEN-1; GRAZ-3	Peterson, Blake	Pickles, Mark

Pierce, Melinda
GRAZ-3
Pierson, Dianne
Pierson, Judith
REC-2
Pike, Judy
Pilhoski, Frank
ACC-13; GEN-1; GRAZ-3
Pillmore, Donn
GEN-13; REC-1
Pillmore, Melanie
GEN-13; REC-1
Pinder, Maggie
ACC-2, 7
Piper, D.
Piper, Robert
Pitcher, Kory
ACC-1; GRAZ-1, 3, 5
Pitula, John
ACC-1; GRAZ-5; REC-2; WSA-3
Planck, Rod and Marlene
ACC-1; GEN-3; GRAZ-3; REC-2
Platt, Dave
GRAZ-1; REC-2
Platt, Krista
REC-1
Pockman, William
ACC-1; GEN-5; REC-1; WSA-2
Pogliano, Loren
ACC-10; REC-2
Poindexter, Charlotte
ACC-13; GEN-1; GRAZ-3
Pokomy, Rhea
Pokomy, Steve
GEN-22
Pokomy, Tami
BIO-1; GEN-5; GRAZ-3; REC-2;
WSA-2
Pollock, David
BIO-5
Pollock, Lonnie
GRAZ-5
Pollock, Megan
ACC-2; REC-1
Pollock, Shanon
ACC-2
Pollock, Shayne

Pollock, David Jr.
BIO-5; GEN-1; REC-1
Poor, Catherine
ACC-13; GEN-1; GRAZ-3
Pope, Judy
ACC-1; WSA-2
Pope, Kelley
ACC-1; GRAZ-5; REC-2; WSA-3
Pope, Alice, Ph. D.
ACC-1; BIO-1; GEN-5; REC-2;
WSA-2
Popolizio, Carlo
GEN-1, 5
Port, David
ACC-1; GEN-7
Porter, Blain
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Porter, Keneth
Porter, Vergean
ACC-2
Portzi, Pam
Post, Paula
GRAZ-1; REC-2
Poster, Bruce
GRAZ-3; REC-2
Potter, Bernice and James
Potter, Gary
Potter, Holly
WSA-2
Potter, John
ACC-2
Potts, Gail
ACC-1; GEN-23; GRAZ-5; LAND-1;
REC-2; WSR-1
Potts, Taylor
Poulsen, Donald
Poulsen, Erin
Poulson, Blaine
Powell, George
Powell, Rod
Pratt, David
REC-2
Pratt, Donna
Pratt, Elizabeth
ACC-1; WAT-4
Pratt, Kathleen and David
GRAZ-3; REC-2

Pratt, Rick
ACC-1; BIO-1; GEN-1
Prescott, Jack
REC-1
Preston, Scott
Prevo, Suzette
GEN-1
Prezulman, Robert
GEN-1
Price, Ed
ACC-1; WAT-4; WSA-2
Price, Evan
Price, Keith
Price, Lisa
BIO-1; GEN-5; GRAZ-3; REC-2;
WSA-3
Price, William
Prisbrey, Jay
Pritchett, Clyde
Pritchett, Robert
Probert, David
Probst, Luke
REC-1
Proe, Steven
REC-8
Proescholdt, Kevin
GRAZ-3; REC-2; WSA-3
Proett, Paul
ACC-1; GEN-1, 5, 11; LAND-1;
REC-2; WSR-1
Promer, Virginia and Wilhelm
ACC-1; GEN-1, 5
Prose, Doug
ACC-1; GRAZ-1; LAND-1
Prosser, Lynn
Provost, John
Pruden, Steven and Michelle
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Pruitt, John
Pugh, Arkay
ACC-5; BIO-1; GEN-1; GRAZ-5
Pugh, Burt
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Pugh, Ian
ACC-5; GEN-1, 13; GRAZ-5; REC-1

Pugh, Roger and Kathleen
ACC-5, 18; GEN-1, 13; GRAZ-5;
REC-1
Pugh, Scott
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Pugh, Susan
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Purrington, Mark
Puzey, Kim
Pyne, Todd
Pyper, Mark
Qualls, Michael
Queley, Jill
Questad, Erin
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Reid, Gayle
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Shumaker, Link ACC-3; WAT-4; WSA-2	Sine, Joe ACC-1; GRAZ-5; REC-2; WSA-3	Slider, Francis ACC-1, 13; GEN-1; GRAZ-3, 5; LAND-1; REC-2; WSR-1	Smith, Jean GEN-1, 5
Shuman, Derek GRAZ-3; REC-2		Sloane, Kenneth GRAZ-3; REC-2	Smith, Jeff and Connie
Shumway, Clare			
Shumway, DeLynn			
Shurman, Mary GEN-1, 22; WSA-2			
Sickel, Kimberly GRAZ-5; REC-2			
Sieburg, Michael GRAZ-5; REC-2			
Sieczkiewicz, Robert GEN-1, 22; WSA-2			
Siegel, Melisa ACC-1; GEN-7			

Smith, Jeffrey
ACC-13; GEN-1; GRAZ-3
Smith, Jerry
Smith, John
Smith, June
ACC-1; GRAZ-5; REC-2; WSA-2
Smith, Karl
Smith, Kiek
Smith, Kyle
Smith, Margaret
Smith, Marie
Smith, Mike
Smith, Peter
ACC-10; ACC-5; GEN-1
Smith, Phillip
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Smith, Raldon
Smith, Randy
Smith, Richard
ACC-2
Smith, Ron and Jana
Smith, Roy
Smith, Sandra
Smith, Scott
GRAZ-5; REC-2
Smith, Sean
BIO-1; GEN-5; GRAZ-3; REC-2;
WSA-2
Smith, Sharron
GRAZ-3; REC-2
Smith, Stanley
Smith, Susan
REC-1; REC-8
Smith, Susan
Smith, Terri
Smith, Todd
GRAZ-3; REC-2
Smith, Tony
Smith, Vernon
Smith, Yda
Smithson, John
ACC-2
Smock, Michael
ACC-13; GEN-1; GRAZ-3
Smock, Sharon
REC-13

Smoot, Mike
GEN-1
Smoyer, Charles
ACC-1, 10; WSA-3
Smyth, Dave
ACC-4, 10; WSA-2
Sneva, Toni
GEN-1; GRAZ-5; LAND-1
Snodgrass, Glenda
REC-1
Snopp, Scott
Snorek, Julie
Snow, Darin
Snow, Stanley
Snow, Troy
Snyder, Brian
Snyder, John
Snyder, Ruby
ACC-2
Snyder, Sheldon
Snyder, William
ACC-2
Socha, Walt
GRAZ-1; REC-2; WSA-3
Sochat, Barry
ACC-1, 5; WSA-2
Solano, Marie - Dolores
ACC-13; GEN-1; GRAZ-3
Solis, Suzanne
REC-8
Sollo, Patrick
Soloway, Mahlon
Somkin, Anthony, M.D.
Sorensen, Amy
ACC-2
Sorensen, Bemard and Boys
Sorensen, Brent
Sorensen, Carol
Sorensen, Chadette
Sorensen, D. Stephen
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Sorensen, Fred
Sorensen, Jared
Sorensen, Ken
Sorensen, S.
ACC-13; GEN-1; GRAZ-3

Sorensen, Seldon
ACC-2
Sorensen, Val
Sorensen, Allen
Sorensen, Casey
Sorensen, Eric
ACC-1
Sorensen, Richard
Sorensen, Russell
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Sorensen, Sunny
GEN-1; GRAZ-3; REC-1
Somsen, Colby
Somsen, Troy
Sousa, Michelle
Southam, Leslie
Southwick, Robert
Souvigney, Jeanne-Marie
ACC-10; GEN-5; REC-2
Sowell, Clyde
Sowers, David and Rosella
Spanko, Jeffrey, Ann, Max, Laura
ACC-10; GRAZ-3
Spearman, Steven
ACC-1; GEN-1; LAND-1
Spears, Randy
REC-2
Spelts, Gayle
BIO-1; GRAZ-3; REC-2
Spencer, Boyd
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Spencer, David
Spencer, Derrel
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Spencer, Marjie
ACC-12; GEN-13; GRAZ-5
Spencer, Necolei
GRAZ-5; REC-2
Spencer, Ray
BIO-5; GRAZ-5; WSA-2
Spencer, Terry
Spencer, Vernon
ACC-5, 12; GEN-1, 13; GRAZ-5;
REC-1
Spenser, Jay
GRAZ-3, 5; REC-2; WSA-3

Sperling, Tamara
ACC-13; GEN-1; GRAZ-3
Spertus, Bob
ACC-10
Spezia, John
ACC-4; GEN-1; GRAZ-3; REC-2;
WSA-2
Spielman, Seth
ACC-1; GRAZ-5; REC-2; WSA-3
Spielmann, Dana
GEN-1; GRAZ-3; LAND-1; REC-2;
WSA-2; WSR-1
Spigarell, Melissa
Spigarell, Robert and Kay
Spiller, R.
Spiller, Robert
Spink, Troy
Spivey, Karl
Spivey, Mike
Spomer, Dan
GEN-7; GRAZ-3
Spor, Regina and Dale
ACC-1; GEN-1, 5; GRAZ-3; REC-2
Spore, Gargot
GRAZ-1; REC-2
Spotts, Richard
GRAZ-3; REC-2; WSA-2
Spotts, Richard
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Spreitzer, Francis
GRAZ-3; REC-2
Spriggs, Monty
Springer, Paul
Springman, Roger
Sprinkle, G.
Spurr, John
ACC-1; GEN-1; WAT-4; WSA-2
Squillace, Mark
GRAZ-1
Stachowski, Karen
GRAZ-1; REC-2
Staff, Leonard
Staheli, Mary
ACC-1; GEN-1; REC-2
Stahl, Edgar
ACC-13; GEN-1; GRAZ-3

Stahl, J.	Steenhof, Karen	Stewart, Eddie	Stortroen, Sherry
Staker, Jack	REC-8	Stewart, Floyd	Story, Dan
Stanbury, Marge	Steenon, Elaine	Stewart, Jennifer	Story, Donald
ACC-5; LAND-1; REC-2	GRAZ-3; REC-2	GRAZ-3; REC-2	ACC-1; GRAZ-5; LAND-1; REC-2;
Standlee, Lassen	Steffenhagen, Bob	Stewart, Kelly	WSA-3; WSR-1
Stanger, Garth	Steger, Michael	Stewart, Phyllis	Story, Mary
Staniforth, Stan	ACC-10; WSA-2	ACC-2	Stowe, David
Stanley, Christian	Stegner, Michelle	Stewart, Rex	ACC-1, 13; GEN-1; GRAZ-3;
ACC-1, 10; GEN-1; GRAZ-3; LAND-1; REC-2; WSA-2; WSR-1	ACC-10	Stickler, Robert	LAND-1; REC-2; WSR-1
Stanley, Clyde	Steichen, David	ACC-2, 10	Strader, Lee and Ellen
ACC-1; REC-2	BIO-1; GEN-5; GRAZ-3; REC-2; WSA-2	Stiles, Tom	GRAZ-3, 5; LAND-1; REC-2; WSA-2; WSR-1
Stanley, G.	Steinhoff, Nadene and Gordon	GRAZ-3; REC-2	Strain, Clint
REC-2; WSA-3	ACC-1; GRAZ-1, 3, 5	Still, Chris	Strand, Caitlin
Stanley, Jennifer	Steinman, Chris	ACC-10; GRAZ-3; REC-2	GRAZ-3, 5; REC-2
ACC-1; GEN-1; LAND-1; REC-2	GEN-5; REC-1; WSA-2	Stilwell, James	Strate, Devin
Stanley, Jill	Steitz, Jim	ACC-1; GEN-1, 5	Stratton, Clay
REC-2; WSA-3	Steitz, Marty	Stiow, Jeff	Stratton, LaWayne and Margo
Stanley, Patricia	GRAZ-1	Stockberger, Randy	Stratton, Lois
Stapleton, John	Stellner, Richard	Stocker, Nancy	Strauss, George
ACC-1; GEN-1; GRAZ-3; LAND-1; REC-2; WSA-2; WSR-1	Stepelton, Kevin	ACC-1; GRAZ-5; REC-2; WSA-3	REC-2
Stapley, Charles	ACC-1; GEN-1	Stoddard, Brent	Strauss, Howard
Stapley, Richard	Stephensen, Rex	Stoker, Janet	Strdhan, Richard
Starr, Anthony	Stephenson, Chris	Stoker, R.	Streeter, Sally
GRAZ-5; REC-2	GEN-1	Stokes, Lynn	GRAZ-3; REC-2
Staton, Audrey	Stern, Adam	ACC-10	Strem, Arielle
ACC-1; GRAZ-5; REC-2; WSA-3	ACC-1; GEN-1, 5	Stokes, Tim	Strobel, Joan and Mark
Stauder, Jack	Stern, Brian	ACC-1	ACC-10; BIO-4; GEN-1, 2, 5, 13; WSR-3
Stebbins, Robin	ACC-1; GEN-1, 5	Stoltman, Jan	Strong, Scott
Steckel, Eric	Stern, Marc	ACC-13; GEN-1; GRAZ-3	Strong, Valerie
GEN-1	ACC-1; GEN-1, 5	Stoltz, Jim	GRAZ-1; REC-2
Steed, Sam	Stevens, Earl	GEN-5; REC-1	Stuart, Linda
ACC-2	REC-1; REC-2	Stone, David	ACC-1; GRAZ-5; REC-2; WSA-3
Steed, Sam	Stevens, Ed	GRAZ-3; REC-2	Stuart, Rob
Steel, Curt	ACC-15	Stone, Jim	ACC-1; WAT-4; WSA-2
ACC-10	Stevens, Hope and Robert	ACC-5; GEN-1; WSA-2	Stuart, Wendy
Steel, Kathlyn	Stevens, Louis	Stone, Ned	ACC-2; REC-14
ACC-13; GEN-1; GRAZ-3	Stevens, Monique	GRAZ-3; REC-2	Stubbs, Brent
Steele, Delan	ACC-10; GEN-1, 5; GRAZ-3; REC-2	ACC-1; GRAZ-5; REC-2; WSA-3	Sturdevant, Mike
Steele, Karin	Stevens, Thadin	ACC-5; GEN-5; WSA-2	Sturgess, Laurie
GRAZ-3, 5; REC-2; WSA-3	Stevenson, Kenneth	Storer, Susan	REC-8
Steele, Lindsay	Stevenson, Robert	ACC-13; GEN-1; GRAZ-3	Sublett, George
Steele, William	GRAZ-3; REC-2	Storer, Suzanne	REC-8
ACC-13; GEN-1; GRAZ-3	Stewart, Alan	ACC-1; GEN-1; GEN-5	Sublett, Hampton
Steenblik, Valarie	Stewart, Bob	Stortroen, Ole	REC-8
	GRAZ-3		
	Stewart, Dorothy	ACC-10	

Sublett, Scott
REC-8
Sucec, David
ACC-1; GEN-1; REC-2
Sudnik, Alex
WSA-3
Sudweeks, La Neeta
Sudweeks, Weldon and Carmen
Sugden, Evan
ACC-1; GEN-5; REC-1; WSA-2
Suhay, Regan
ACC-1; GRAZ-5; REC-2; WSA-3
Suits, Butch
Suk, Tom
GEN-1; GRAZ-3; REC-2; WSA-2;
WSR-1
Sullivan, Carol
ACC-2; WSA-2
Sullivan, Edward
GRAZ-1; REC-2
Sullivan, John and Lili
Sullivan, Kim
ACC-1; GRAZ-1, 3, 5
Sullivan, LaMar
ACC-2; GEN-13; GRAZ-3; WSR-3;
WSR-4
Sullivan, Timothy
ACC-13; GEN-1; GRAZ-3
Summer, Baehuu
Summers, Autumn
Sumner, David
Sumner, Greg
GEN-1, 5
Sumner, Robert
GEN-1; REC-2
Sunderland, William
Sundstedt, David
ACC-1; GRAZ-3; REC-2
Susan, Richard
Sussman, Deb
REC-8
Sutherland, Bernie
Sutherland, Ron
Sutliff, David
Sutten, George Jr.
Sutton, Lorraine

Svella, Cathy
ACC-1; GEN-1; GRAZ-1; WSR-1
Swain, Jim
Swain, Patricia
GEN-22
Swaine, Thomas
ACC-1, 5; GEN-22; GRAZ-5; REC-2
Swan, Paul
Swaney, James
LAND-1
Swank, Glen
ACC-9, 14, 15, 16; WSA-3
Swanson, Brian
GRAZ-1; REC-2
Swanson, Frederick
ACC-1; GEN-5
Swanson, John
ACC-1, 10; GEN-1; GRAZ-1;
LAND-1; REC-2; WSA-3; WSR-1
Swanson, Lisa
GEN-5; REC-1; WSA-3
Swapp, Patricia
Swapp, Richard
ACC-2; GEN-1, 13, 15, 43, 44, 45;
GRAZ-3, 5; LAND-1, -5; REC-8;
WAT-1, 2, 6; WSR-3
Swartz, Deborah
GRAZ-3, 5; REC-2; WSA-3
Swartz, Lloyd
ACC-2, 8, 10
Swasey, Duane
Swayze, Gregg
ACC-1; LAND-1; WSA-2; WSR-1
Sweat, Kimberly and Kelly
Sweeney, Alice
BIO-1, REC-10
Sweeney, Kevin
GEN-5
Sweet, Charlie
Swenson, David
GEN-13
Swenson, Gordon
ACC-3
Swinehart, Dave
ACC-1; GEN-1; GRAZ-3; LAND-3;
REC-2;
WSA-3; WSR-1

Switzer, Heidy
REC-8
Sykes, Dwane
Symes, Scott and Jean
Symms, William
Syrett, Jentre
ACC-2; REC-1
Syrett, Skyler
ACC-12
Tabish, Dave
Tabish, Jason
Tabone, Gerri
Tabone, Jeremy
Tackett, Kara
GEN-1
Taft, Ann
ACC-1, 10
Takaro, Mark
ACC-1, 10; REC-2
Talbot, Ed
ACC-10; GRAZ-3; REC-2; WSA-3
Tamaroff, Ruth
ACC-1; GRAZ-5; REC-2; WSA-3
Tanner, Jeffery
Tanner, Steven
Tanner, Wesley and Myrle
ACC-10
Tanner, William
BIO-1; GRAZ-3, 5; REC-2, 10
Tatton, Richart
Tatum, Sheree
Taylor, Alice and Harry
Taylor, Daniel
Taylor, Dyanna
ACC-1
Taylor, Frank
ACC-13; GEN-1; GRAZ-3
Taylor, Frank and Marion
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Taylor, Harold and Christina
ACC-5; GRAZ-3
Taylor, Jack
Taylor, Jeff
ACC-1; GRAZ-5; REC-2; WSA-3
Taylor, Jennifer

Taylor, Melvin
ACC-2; Gen-13, 15; GRAZ-5
Taylor, Michelle
GEN-1, 5
Taylor, Rebecca
ACC-1; GRAZ-5; REC-2; WSA-3
Taylor, Robert
Taylor, Sidney
Taylor, Stuart
ACC-10; WSA-3
Taylor, Suesan
Taylor, Timothy
Taylor, Travis
Teague, Jonathan
ACC-10; GEN-1; GRAZ-3; LAND-1;
REC-2;
WAT-4; WSA-2
Teal, Louise
ACC-1; GEN-1
Teeter, Staphanie
REC-8
Telesetsky, Anastasia
GRAZ-1
Tembrock, William
ACC-1; GRAZ-3; REC-2
Tempel, Douglas
ACC-5, 10; WSA-2
Temple, David
Terebey, Nicholas
Terrel, Lark
GEN-13; GRAZ-5
Terry, Kaye
GRAZ-1; REC-2
Terry, Michelle
GEN-1, 22
Terwillinger, James
Thaden, Bob and Marilyn
ACC-1, 5
Thatcher, Curtis
GEN-1
Thaw, Steve
GRAZ-5; REC-2
Thaw, Steven
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Thayer, Doug
BIO-4; GEN-5; LAND-1; WSR-1

Thesen, Sven GRAZ-3; REC-2	Thompson, Gordon GRAZ-3; REC-2	Tidwell, Tony Tiemen, Tom	Tousley, Walt and Ruth Toyn, Gary
Thomas, Barbara REC-8	Thompson, Greg Thompson, Guy ACC-2, 9, 12; BIO-5; GEN-15; LAND-1	Tietz, Tina ACC-13; GEN-1; GRAZ-3	Trautvein, Jens Tearse, A. R. GRAZ-1; REC-2
Thomas, Bill REC-2	Thompson, Hal Thompson, Heidi ACC-2	Tighe, Dennis GRAZ-5; REC-2	Trefonas, Jason ACC-1; GEN-1; GRAZ-3; LAND-1; WSA-2; WSR-1
Thomas, Chris Thomas, Dan Thomas, Darrell Thomas, Dave Thomas Family Thomas, J. Thomas, Jacob Thomas, John ACC-13; GEN-1; GRAZ-3 Thomas, Karen ACC-10; WAT-4; WSA-2 Thomas, Lynn Thomas, Mike Thomas, Neil Thomas, Richard Thomas, Robert Thomas, Robert and Ursula GEN-1; GRAZ-3 Thomas, Verl Thomas, W. Thompson, Barbara REC-2 Thompson, Charles GEN-1; GRAZ-3; REC-2; WSR-1 Thompson, Chris Thompson, Chuck Thompson, Clyde Thompson, Craig Thompson, Darwin Thompson, David ACC-1, 13; GEN-1; GRAZ-3, 5; LAND-1; REC-2; WSR-1 Thompson, David Thompson, Dixie REC-1 Thompson, Elaine ACC-1; GEN-1, 11; LAND-1; REC-2, 8; WAT-2; WSR-1, 5 Thompson, George	Thompson, James ACC-3, 10; BIO-4; GEN-1; LAND-1; WSA-2; WSR-1 Thompson, Jeff ACC-13; GEN-1; GRAZ-3 Thompson, Joe ACC-2 Thompson, Keith Thompson, Kevin ACC-1 Thompson, Larry Thompson, Lydia Thompson, Marshall REC-1 Thompson, Nathan ACC-12 Thompson, Rosa REC-1 Thompson, Skye Thompson, Spencer Thompson, Tom GEN-1; GRAZ-3; REC-2; WSR-1 Thompson, Tommy Thompson, Dr. Kent Thomson, Greg Thomson, Savannah ACC-2 Thompson, Christine Thorley, Todd Thome, Ned Thomton, Doug Thuemler, Ron ACC-1; GRAZ-5; REC-2; WSA-3 Thurgood, Carl Thurgood, Lewis Thurgood, Lynda Tibbitts, Susan	Tillinghast, Stephen Tilton, Buck ACC-13; GEN-1; GRAZ-3 Tilton, Tim Timmel, Luren ACC-2; GEN-13, 15; GRAZ-5 Timmons, Mike and Leslie ACC-1; GRAZ-1, 3, 5 Tinklefaugt, John GRAZ-3; REC-2 Tipping, Terri ACC-1; GRAZ-3; WSA-3 Tisdale, Loran Toback, Andrea GRAZ-1; WSA-3 Tober, Jeff Togerson, Justin Toilike, George and Teri Tol, Tony ACC-1; GRAZ-1; REC-2 Tolladay, Joanne GEN-5; GRAZ-3; WAT-4 Tomiczek, Paul Tomlinson, Trent Tomshack, Gary Toombs, Suzanne Toothaker, Virgil REC-8 Torbett, Glenn GEN-5; WSA-2 Torgerson, Dan ACC-2; GEN-13, 15; GRAZ-5 Torgerson, Rick and Heather Torgerson, Terry Torgerson, Troy Tork, Marcus ACC-1; GRAZ-5; REC-2; WSA-3 Tornbom, Jeff Torrisi, Gene	Trejo, Jesus Trent, Barry Trimble, Stephen ACC-1; GEN-1; REC-2 Triolo, Phil ACC-1; GEN-1, 5 Triplett, Eric Trotter, John ACC-1 Trowell, Clark GRAZ-3; REC-1, 2 Troxel, Jeff ACC-1; WSA-2 Truax, Wayne ACC-13; GEN-1; GRAZ-3 Truex, Ted GRAZ-3; REC-2 Trumbull, Lucy REC-8 Tryon, Fred Tsegi, Coral GRAZ-3; REC-2 Tseng, Alice GRAZ-3; WSA-3 Tucker, Dean Tucker, George Tucker, George Tucker, Jeanne and Donald Tucker, Lynn Tucker, Pat Tucker, Patrick Tucker, Roger and Pamela GRAZ-1; REC-2; WSA-3 Tueller, Paul Tuff, Paul GRAZ-3; REC-2; WSA-3 Tuggle, Melissa Tuke, Carla ACC-5; GEN-5; WSA-3

Tull, Mary GRAZ-3; REC-2	Utley, Jeff Vagle, Beth and Wade GEN-1, 22	Vaughn, Katie REC-8	Voelkel, Ron ACC-1; GRAZ-5; REC-2; WSA-3
Tulley, Tara GEN-1, 22	Vail, Sandra GEN-5; REC-1	Vdovin, George ACC-1; GRAZ-5; WSA-3; WSR-1	Vogel, William ACC-10
Tullis, Lesley ACC-10; REC-2; WSA-2	Valdez, Bernice GRAZ-3; REC-2	Veasman, Jean Vectols, Dermns	Vogler, Glen Voigt, Linda REC-1, 8
Tuma, Gary ACC-13; GEN-1; GRAZ-3	Valdez, Connie and Larkey Valentine, Janet BIO-1	Veidmark, Aaron Veidmark, Abe Vengco, Ronaldo ACC-1; GRAZ-5; REC-2; WSA-3	Vondrak, Andrew Voorhies, Bill and Marilyn BIO-1; GEN-5; GRAZ-3; REC-2; WSA-3
Turner, Brad Turner, Frank GEN-5	Vali, Rita ACC-1, 5; REC-1	Veranth, John Verdoorn, Heather ACC-2	Vos, Biefke ACC-13; GEN-1; GRAZ-3
Turner, Michael GEN-1, 22	Vallone, Cheryl ACC-1, 13; GEN-1, 23; GRAZ-3, 5;	Vernon, Ann, Patrick and Charles GRAZ-1; REC-2	Voss, Rene ACC-1; GRAZ-1
Turner, My Turner, Victor	LAND-1; REC-2; WSA-3; WSR-1	Vernon, John GRAZ-3; REC-2	Wachenheim, Scott and Beth GRAZ-1; REC-2, 8
Turpin, Pete and Nancy ACC-10; WSA-3	Van Buren, Renee ACC-1	Verzelle, Liza BIO-1; GRAZ-3; REC-2, 10	Wade, Catherine ACC-1; GRAZ-5; REC-2; WSA-3
Tuttle, Dell Twitchell, Cole	Van Every, Marsha GRAZ-5; LAND-1; REC-2; WSR-1	Vesco, Richard Vetter, Jack	Wade, Christopher Wadsworth, Fred
Twitchell, Kam ACC-2	Van Genderen, Heidi Van Hann, James GEN-3	Viavant, Bill GEN-1	Wadsworth, Shelly Wagener, Jefferson GRAZ-5; REC-2
Twitchell, Lamonte ACC-5; GEN-1, 13; GRAZ-5; REC-1	Van Hook, Chris Van Horn, Paul ACC-12; REC-1	Vick, Eckhard Vignere, Joel ACC-10; GEN-1, 11; GRAZ-3; REC-2, 8; WSR-1	Wagner, Chris GEN-1, 22
Twitchell, Nancy ACC-5; BIO-5; GEN-1; WAT-2	Van Hove, Teresa Van Lenven, Ross Van Ord, Autumn ACC-1, 10; REC-2; WSA-2	Vignere, Joel ACC-1	Wagner, Karin ACC-13; GEN-1; GRAZ-3
Twomey, Ryan ACC-5; GEN-5; WSA-2	Van Summer, Mark Van Summern, Gayle ACC-1; GRAZ-5; REC-2; WSA-3	Viles, Aaron GRAZ-5	Wagner, Terry REC-1, 8
Tyler, John Udall, Brad	Van Wagoner, Tim Vanatta, Yeffi ACC-1; GEN-1; GRAZ-1	Villaggio, Chris ACC-1; GEN-1, 5, 11; LAND-1; REC-2; WSR-1	Wagner, Tim ACC-1; GRAZ-1, 3, 5
Udy, Rick Uhlmann, Anne GEN-5	Vanderbie, Jan GRAZ-3; REC-2	Vincent, Douglas ACC-1; GEN-1, 5, 11; GRAZ-3; LAND-1; REC-2; WSR-1, 2	Wagstaff, D. Wahl, John ACC-1, 10; GEN-1, 5; GRAZ-3; REC-2
Ulery, Susan ACC-1	VanDerhyden, Clifford ACC-7	Vincent, George ACC-1; GEN-1, 5, 11; LAND-1; REC-2; WSR-1	Wahlstedt, Bob Wake, Paul GEN-1
Ulvang, Myra GRAZ-3; REC-2; WSA-2	Vane, Joe Vanko, Peter	Vincent, Shirley ACC-1; GEN-1, 5, 11; LAND-1; REC-2; WSR-1	Wakeland, W.M. GRAZ-3; REC-2
Ulyate, Holly REC-8	Vaslet, Paul ACC-1; GRAZ-1, 3, 5	Vincent, Thomas Visor, Bill	Wald, Michael GEN-1; GRAZ-3; WAT-4
Umms, Jane ACC-1; GRAZ-5; REC-2; WSA-3	Vaughan, Steve Vaughn, Henry REC-8	Vodraska, Adrienne	Waldman, Stephen ACC-1; GRAZ-1
Underwood, Cathy GRAZ-3; REC-2; WSA-3			Walke, Jim GEN-5; GRAZ-3; REC-2
Underwood, Steve Updike, Mary			
Upwall, Gregory REC-2			
Utley, Cheryl			

Walkenhorst, Jared
ACC-1; GRAZ-5; REC-2; WSA-3
Walker, Curt
GEN-1
Walker, Ellen
GEN-7
Walker, Faith
GRAZ-3; REC-2
Walker, John
ACC-3; GEN-1
Walker, Karl
Walker, Kent
Walker, Merlin
Walker, Roger
Walker, Theresa
Walker, Tom
ACC-1; GEN-1, 5
Wall, Cory
Wall, Kenneth
Wall, Toni
Wallace, Anne
Wallace, Carleen
GEN-1
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GRAZ-1; REC-2; WSA-2, 3
Wallace, John
Wallace, Leslie
GEN-1, 5, 11; GRAZ-3; LAND-1;
WSR-1
Wallace, Robert
ACC-1, 10
Wallen, Norm
GRAZ-3; REC-2
Wallner, Jack
LAND-1; REC-2
Walls, Barbara
GRAZ-3; REC-2
Walschlager, Gerard
ACC-13; GEN-1; GRAZ-3
Walsh, David
ACC-1; GRAZ-5; REC-2; WSA-2
Walter, Debby
ACC-1; GEN-1, 5
Walter, Leo
ACC-10; REC-2
Walter, Marilyn
ACC-1; GEN-5; GRAZ-5

Walter, Sydney
GRAZ-1; REC-2
Walters, Ralph
Walton, Bryon
ACC-13; GEN-1; GRAZ-3
Walton, Sam
REC-2; WSA-2
Walton, Virginia
Warble, Steve
ACC-1; GEN-1, 23; LAND-1; REC-2;
WSA-3; WSR-1
Ward, Bertha
Ward, Clarence
Ward, Clyde
Ward, Craig
ACC-13; GEN-1; GRAZ-3
Ward, Eleanor
ACC-1; REC-2
Ward, Everett (Chip)
ACC-1; GRAZ-1
Ward, Jill
ACC-1; WSA-3
Ward, Ronald
Wardell, John
ACC-1; GRAZ-5; REC-2; WSA-3
Warenski, Jerralyn
Warenski, Keith
Warenski, Nicki
Warenski, Randy
Warnell, Ronald
ACC-1; GRAZ-5; REC-2; WSA-3
Warner, Barbara
GRAZ-3; REC-2; WSA-3
Warner, Jeff
Warner, Weston
Warnick, Kyle
Warnick, Scott
Warren, Dean and Susan
ACC-1; GRAZ-1, 3, 5
Warren, Scott
Warren, Weston
Wasinger, Korrinne
ACC-1; GRAZ-5; REC-2; WSA-3
Watkins, Kenny
Watkins, Nancy
GEN-5; REC-1; WSA-2

Watkins, Paula
ACC-1; GRAZ-1, 3, 5
Watkins, Richard and Paula
ACC-1; GRAZ-1, 3, 5
Watson, Alan "Mac"
GEN-1; LAND-1; WSA-2
Watson, Jack
Watson, John
ACC-1; GEN-1
Watson, Kent
Watson, Robert
Watson, Wes
Watters, Brian
Watts, Bob
Watts, Don
Watts, Michael
Watts, Susanna
ACC-7
Way, Bonnie
REC-8
Way, Susan
BIO-4; GEN-1, 2, 30; GRAZ-1
Weathers, Mary
GEN-5; REC-1
Weaver, Joe
Weaver, Lu
Webb, Brian
Webb, Dixie
Webb, Forrest
Webb, Jeff and Michaela
GEN-5; REC-2; WSA-2
Webb, Kent
ACC-1; GRAZ-1, 3, 5
Webb, Rob
ACC-13; GEN-1; GRAZ-3
Webber, Jackie
WSA-2
Weber, Bret
Weber, John
GRAZ-3; REC-2
Weberg, Bill
GRAZ-3, 5; REC-2; WSA-3
Webster, John
ACC-1; GEN-1; GRAZ-3; LAND-1;
REC-2; WSA-2; WSR-1
Wechter, Rita
REC-2

Weeden, Catherine
ACC-13; GEN-1; GRAZ-3
Weeks, Cynthia
ACC-13; GEN-1; GRAZ-3
Weeks, David
Weeks, Ken
ACC-1; GRAZ-1
Weeks, L.E.
GRAZ-1; REC-2
Weickhardt, Kathleen
Weide, Bruce
Weidl, Dick
Weikamp, Babara
GRAZ-3; REC-2
Weinstock, Mrs. Robert
ACC-1; GRAZ-3; LAND-1; REC-2
Weintraub, Marc
GEN-1; GRAZ-3; REC-1, 8
Weirick, Bob
GRAZ-1; REC-2
Weis, Paul
ACC-1, 3; GEN-1; GRAZ-3; LAND-1;
WSA-2
Weiskerger, David
ACC-13; GEN-1; GRAZ-3
Weiss, John Jr.
Weissman, Eric and Barbara
GEN-1; REC-2
Weissman, Kerry and David
GEN-1; GRAZ-3; REC-2; WSA-2;
WSR-1
Weitlauf, Paul Sr.
ACC-10
Welch, Marge
Welcker, Kenneth
Welder, Bill
ACC-10
Welder, Chris
ACC-10
Welder, Dean
ACC-2
Welder, John
ACC-10
Welder, Karen
ACC-10
Welder, Leila
ACC-2

Welder, Leimin
ACC-10
Welder, Peggy
ACC-10
Weller, Ben
ACC-2
Weller, Fae
Wells, Darrell
Wells, Tom and Becky
ACC-2
Wemple, Bob
ACC-1, 5; WSR-1
Wende, Mike and Jody
ACC-13; GEN-1; GRAZ-3
Wendling, Kathy
ACC-1; GEN-1; GRAZ-3; LAND-1;
REC-2; WSA-1; WSR-1
Wendt, Sharon
GEN-1; REC-1
Wengreen, Earl
Werdinger, Leon
Werkmeister, Mark
ACC-2, 15
Wescot, D.
ACC-5, 8, 18
West, Fay
Westcott, Kenneth
ACC-2
Westendorf, Dr. Craig
ACC-1; REC-1
Westerman, Peter
ACC-1
Westervelt, Dean
Weston, Dan
Weyers, Lori
ACC-1, 10; REC-2; WSA-3
Whalen, Kini
GRAZ-1; REC-2
Whalley, John
Whatcott, Gayle
Wheat, Francis
ACC-1; REC-8; WAT-2; WSA-2
Wheatley, Margaret
REC-2
Whedbee, Donna
GRAZ-1; REC-2
Wheeler, George

Wheeler, J.
ACC-13; GEN-1; GRAZ-3
Wheeler, Scott
Whete, John
Whitaker, Howard
ACC-5; GEN-1, 5; GRAZ-3; REC-2;
WSA-2; WSR-1
Whitaker, Jason
White, Alan
GEN-1; REC-2
White, Angela
White, Greg
White, Gregg
White, Jerry
ACC-1; GRAZ-5; REC-2; WSA-3
White, Joane
REC-8
White, Lance
White, Lornie
GRAZ-3; REC-2
White, Melvin
White, Polly
ACC-18; GEN-1, 13
White, Randall
ACC-13; GEN-1; GRAZ-3
White, Robert
White, Shirt and Debbie
ACC-5; GEN-1; GRAZ-5; REC-1
Whitehead, Dennis
ACC-5; REC-1
Whitehead, Ron
Whitehom, Robert
ACC-2
Whiteley, Gary
Whiting, Nicole
ACC-1; GRAZ-5; REC-2; WSA-3
Whiting, Robert
Whitley, Scott
ACC-1, 10; REC-2; WSA-2
Whitman, David
WSR-1
Whitney, Holly
WSA-3
Wickel, Don
Wickham, Leslie Jr.
Wickliffe, C.
ACC-2

Widolf, Bill
GRAZ-1; REC-2
Wiedenhoef, Dody
Wieder, Mark
Wiener, Howard
ACC-1; GEN-1, 5
Wiggill, Steven
Wignall, Jerry and Lene
Wilcock, Russ
Wilcox, Bob
Wilcox, Richard
Wilde, Bent
Wilde, Dusay
Wilde, Randy
Wilde, Wendell
Wiley, Alynne
ACC-1; GEN-5
Wilke, John
ACC-13; GEN-1; GRAZ-3
Wilkes, Gary
Willard, Page
ACC-5; GEN-1, 13; GRAZ-5; REC-1
Willard, Rudy
Willardson, Timothy
Williams, David
GRAZ-1
Williams, D
Williams, Delvin
Williams, Dennis
Williams, Jay
Williams, Lance
Williams, Lance
ACC-5; GEN-5
Williams, Lesley
GRAZ-3, 5; REC-2
Williams, Mark
ACC-10
Williams, Robert
ACC-9, 14, 15, 16; WSA-3
Williams, Robert
REC-8
Williams, Roger
ACC-1; GRAZ-3; REC-2; WSA-2
Williams, Sally
GRAZ-3
Williams, Thomas
Williams, Troy

Williams, Wesley
Williamson, Peter
GRAZ-3; REC-2
Wilson, Bob
Wilson, Brad
Wilson, Brett
GEN-1; REC-2
Wilson, Charles
ACC-10
Wilson, Chris
ACC-10; GEN-1; WSA-2
Wilson, Howard
ACC-13; GEN-1; GRAZ-3
Wilson, Jack
ACC-2
Wilson, James
GEN-5
Wilson, Joel
Wilson, Leslie
ACC-1; GEN-1, 5
Wilson, Loretta
REC-8
Wilson, Mark
ACC-1
Wilson, Mindy
WAT-4; WSR-1, 4, 6
Wilson, Patricia
ACC-2
Wilson, Pete and Amelia
Wilson, Robert and Karen
GRAZ-3; REC-2
Wilson, Ronald
ACC-2
Wilson, Russel
Wilson, Sherrill
GRAZ-5; REC-2
Wilson, Tim
REC-1, 2
Winawer, Hank
ACC-10; GEN-1; LAND-1; WSR-1
Windley, C. Jack
Wingerter, Eric
ACC-1; GEN-1; GRAZ-3; WSR-1
Winkler, James
Winn, Elizabeth
GRAZ-3; REC-2
Winn, Steven

Winsemsius, Aurelia
ACC-1, 10; GEN-1; GRAZ-3; REC-2,
7
Winsett, Oliver
ACC-13; GEN-1; GRAZ-3
Winters, Steve
ACC-1; GRAZ-5; REC-2; WSA-3
Winward, LaMar
Wirth, Randolph
Wiscombe, Stephen
Wise, Liz
GRAZ-5
Wiseman, Mollie
GEN-5
Wisemen, Virginia
Wiss, Carrie
ACC-1; GEN-1; REC-2
Woffinden, Jeron
Wolf, Mark
ACC-2
Wolf, Mike
ACC-1; GEN-1
Wolfe, Don
ACC-1; GRAZ-5; LAND-1; REC-2;
WSR-1
Wolfe, Gene
GRAZ-3; REC-2
Wolfgaman, Mavna
Wolking, Corell
ACC-1; BIO-1
Won, Yhoumey
ACC-13; GEN-1; GRAZ-3
Wong, Jeffrey
GEN-1, 22; WSA-2
Wood, Blake
ACC-1; GRAZ-5; REC-2; WSA-3
Wood, Dan
Wood, Don
Wood, Donald and Margaret
ACC-1; GEN-5; REC-1
Wood, Gordon
Wood, Heather
Wood, Lester
ACC-1; GEN-1; GRAZ-3; REC-2
Wood, Maynard
GRAZ-3; REC-2

Wood, Peggy
ACC-1; GRAZ-1, 3, 5
Woodard, Victoria
ACC-10; BIO-4; GEN-1
Woodhouse, Tom
Woods, Darrell
Woods, James
GEN-1; GRAZ-4; WSA-2
Woodward, Dian
Woodward, Jewell
GRAZ-3; REC-2
Woodward, Mary
GEN-5; REC-1
Wooton, Charles
Worssam, Geoffrey
Worthen, Ellis
Wouddowski, Lora
Wozny, Kirsten
GRAZ-5; REC-2
Wren, Vicky
Wright, Clay
Wright, David
GEN-5; REC-1; WSA-2
Wright, Denise
ACC-13; GEN-1; GRAZ-3
Wright, Kris
REC-8
Wright, Norman
Wright, Pearl
Wright, Rhonda
Wright, Ricky
Wright, Stephen
Wright, Terry
Wright, Tony
ACC-7
Wuerthner, George
ACC-1, 10; GRAZ-1, 3; REC-2
Wulfenstein, Bevan
Wybeng, Ken
REC-2
Wycklendt, Anne
Wyeth, George
ACC-13; GEN-1; GRAZ-3
Wyeth, Nathan
ACC-1; GEN-1; LAND-1; REC-2;
WSA-2
Wyhlie, B.

Wynn, Daniel and Cindie
ACC-2
Wysopal, George
GEN-16
Wyss, Mitch
ACC-10; REC-2
Yaffe, Linda
GRAZ-3; REC-2
Yardley, Russell
Yates, Jeff
ACC-2
Yates, Marlin
Yaur, Cameron
Yazzie, Jane
ACC-1, 10
Yeager, Jodie
Yegian, Jeff
GEN-5; REC-1
Yehle, Fran
ACC-10
Yeske, Allen
Yewell, Susan
GRAZ-1, 3; REC-2; WSR-1
Yiker, Jonathan
GRAZ-3; REC-2
Young, Allen
Young, Bonita
REC-8
Young, Brett
Young, Carl
ACC-1; GEN-1; WSR-1
Young, Dick
ACC-2, 8
Young, Dick
ACC-14
Young, Gene
Young, Hugh
ACC-1, 5; GRAZ-3; REC-2
Young, James and Daisy
Young, Jason
Young, Larry
Young, Marilyn
Young, Pamela
GEN-1, 13; GRAZ-5
Young, Paul
Young, Richard
Young, Stan

Young, Susan
ACC-1
Younger, Ronald
ACC-1; BIO-4; GRAZ-5; WAT-4
Zadis, Peter
REC-2
Zadis, Peter
REC-2; WSR-1
Zaffino, Lynda
REC-1, 4
Zane, Janis
ACC-13; GEN-1; GRAZ-3
Zarkovich, Josephine
GEN-1
Zaugg, Jared
Zebell, Margie
ACC-1; GEN-1; GRAZ-3; LAND-1;
REC-2; WSA-2; WSR-1
Zebell, Margie
ACC-13; GEN-1; GRAZ-3
Zehrbach, Thomas
Zeigler, Robert
Zeoli, Len
GEN-5; GRAZ-5; REC-2
Ziler, Larry
ACC-1
Zimmerman, Kyle
Zinn, Robert
ACC-13; GEN-1; GRAZ-3; REC-2
Zinsli, Gabriel
Zobell, Cory
Zoller, Hillary
ACC-1; GRAZ-5; REC-2; WSA-3
Zollinger, Jim
Zufelt, Bob
Zufelt, Sandy
Zumwalt, Glen
Zumwalt, Judy

There were 149 names from comment letters that could not be read. The comments from those letters were reviewed and categorized as described above.

COMMENTS AND RESPONSES ON THE DRAFT MANAGEMENT PLAN

This section contains the comments received from individuals, organizations, and governmental agencies during the comment period for the DMP/DEIS. The comments are organized by the nine categories discussed previously. Following each comment is the BLM's response.

ACC-1

COMMENT: An array of comments were submitted on all-terrain-vehicle (ATV) use ranging from "prohibit all non-street legal ATV and dirt bike use" to "allow non-street legal vehicles," and "clarify the difference between street legal and non-street legal vehicles."

RESPONSE: Any motor vehicle properly registered for highway use is considered street legal. In Utah, ATVs cannot get safety inspections, so they cannot be registered for highway use. ATVs are considered an all terrain vehicle type 1, which is a motor vehicle 50 inches in width or smaller, weighing 700 pounds or less, having 3 or more low pressure tires, having a seat designed to be straddled by the operator, and designed for travel over unimproved terrain.

The management of ATVs is described in detail in the **Transportation and Access**

section in Chapter 2 of this Plan. Because use of ATVs off designated routes has the potential to damage Monument resources, their use off of designated routes would be prohibited throughout the Monument. Specific routes which could be used by non-street legal vehicles are shown on Map 2.1.

ACC-2

COMMENT: Why can't all existing routes remain open, including the Paria River/Sheep Creek route?

RESPONSE: A number of routes are proposed for closure in this Plan in order to protect Monument resources. It has been determined that the access needs of the surrounding communities and the needs of the users of the Monument can be met by the transportation network in this Proposed Plan. Leaving all routes and trails open could jeopardize the integrity of the resources which the Monument was designated to protect. In particular, allowing vehicle use in the Paria River/Sheep Creek route has the potential to damage riparian resources which comprise less than 1 percent of the Monument and provide crucial habitat for nesting birds and vertebrates in the area. However, many routes would remain open in this Proposed Plan. Map 2.1 shows the routes that would be open for public use and those available for administrative use only.

ACC-3

COMMENT: How is the BLM going to monitor vehicle use in the backcountry, including enforcement?

RESPONSE: In order to monitor vehicle use, additional staff, including law enforcement personnel, would be hired to patrol by foot, horse, and vehicle. In addition, the BLM would be proactive in providing information to visitors about which routes are open. Refer to the **Enforcement** section in Chapter 2 of this Plan for more information on the enforcement strategy.

ACC-4

COMMENT: An array of comments were submitted on ATV use, ranging from "ATVs should be banned or limited to smaller areas" to "ATVs should be allowed on more routes."

RESPONSE: As stated in the **Transportation and Access** section in Chapter 2 of this Plan, the unregulated use of off-highway vehicles (OHV) (both street legal and non-street legal) off of designated routes has the potential to damage Monument resources, cause recreation conflicts, and cause erosion. Therefore, cross-country travel by motorized vehicles, as well as mountain bicycles, would be prohibited. The use of ATVs has been allowed on most routes designated for motorized vehicles, except those where state or local laws prohibit their use, where the anticipated volume and speed

of larger vehicles makes ATV use unsafe, or where conflicts with adjacent land management agencies may occur.

ACC-5

COMMENT: Explain the administrative use policy for access and who can use these routes. How will exceptions to motorized access be determined?

RESPONSE: As stated in the **Administrative Routes and Authorized Users** section in Chapter 2 of this Plan, the BLM would be responsible for administrative routes which would be limited to authorized users. Authorized users could include grazing permittees, researchers, state or Federal agency personnel, and others carrying out authorized activities under a permit or other authorization. Administrative routes are existing routes that lead to developments where the BLM or some permitted users must have regular access for operation or maintenance. These authorized developments include such things as powerlines, cabins, weather stations, communication sites, spring developments, corrals, and water troughs. Access on these administrative routes would be strictly limited and would only be granted for legitimate and specific purposes. Beyond the routes shown on Map 2.1 of this Plan, the BLM would work with any individual operating within the Monument under existing permits or authorizations to document where access must continue in

order to allow operation of their permit or authorization.

As stated in Chapter 2 and ACC-20, limited exceptions to the general management provisions (including off-highway vehicle use) could be granted by the Monument Manger for emergencies or where clearly essential to serve Monument management purposes.

ACC-6

COMMENT: Research opportunities may be curtailed due to route closures. Are there provisions for special vehicle access for researchers? How would exceptions for researchers be made in general?

RESPONSE: In general, researchers would be required to comply with access restrictions outlined in this Plan (i.e., travel on designated routes). The BLM recognizes that some research opportunities may need to be accessed via means other than vehicles. Except where specifically prohibited (e.g., relic plant areas), the BLM would evaluate exceptions to access restrictions during the special-use permitting process for extremely high-value research opportunities as described in the **Management of Science and Research Activities** section in Chapter 2 of this document. The BLM would evaluate whether the proposed research could be permitted in a manner consistent with the protection of Monument resources, and whether the methods (and access) proposed

are the minimum necessary to achieve the desired research objective.

ACC-7

COMMENT: How does the Plan address the American with Disabilities Act (ADA) and what, if any, accommodations does the BLM intend to make so that people of all abilities can experience the Monument?

RESPONSE: The BLM will comply with the ADA in the Monument. Both the DEIS and this Plan would provide access for people of all abilities and facilities in the Frontcountry Zone. However, the ADA does not prohibit the BLM from restricting travel routes or closing areas to vehicles in order to protect Monument resources.

ACC-8

COMMENT: Various people requested that specific routes be kept open or be closed. General comments that routes should be closed were also received.

RESPONSE: Every individual request for keeping specific routes open or closed was reviewed and evaluated by the BLM, and a determination was made on their status for this Plan. Each request was evaluated on the basis of the considerations stated in the **Transportation and Access** section in Chapter 2 of this Plan. The basic philosophy in deciding which routes would be left open was to determine which routes access some

destination (e.g., scenic overlook, popular camping site, heavily-used thoroughfare), and present no significant threat to Monument resources. Routes that were not considered necessary or desirable (for resource protection purposes) would not be kept open for public access.

ACC-9

COMMENT: Why was there no transportation map for Alternative A in the DEIS? Why was there no inventory of existing routes?

RESPONSE: Alternative A (No Action Alternative) in the DEIS describes current conditions. A transportation map was not included for this alternative in the DEIS because a comprehensive inventory of routes in the Monument has not been conducted. The route data (2,176 miles) reported for Alternative A are based upon United States Geological Survey (USGS) topographic maps prepared in the 1970s. These data were supplemented by BLM specialists based on personal knowledge, BLM Surface Management Status Maps, Forest Service Cartographic Feature Maps, and other information available at the time. None of these sources was considered to reflect the complete status of the routes within the Monument. Therefore, a map displaying these routes was not included in the DEIS because the data have not been verified and are likely to include errors. Given that a comprehensive route inventory would have

delayed the development of this Plan considerably, and that the USGS route data, as modified, were the best available data, the BLM decided to proceed using the 2,176 miles of routes as a best estimate. The Environmental Consequences section of the DEIS used this data to describe the relative impacts from the transportation networks in each alternative. This analysis has been supplemented as described in ACC-14. A map displaying the route network for Alternative A is not considered necessary to this analysis. A precise route inventory was also not necessary for the BLM to develop its proposed transportation network. As described in the **Transportation and Access** section in Chapter 2 of this Plan, the transportation network was based on analysis of which routes access necessary or desirable destinations (based on existing knowledge and public input) and which routes present no significant threat to Monument resources. The BLM, after public comment, has concluded that for the proper care of Monument resources, remaining routes that were not considered necessary or desirable would be closed.

ACC-10

COMMENT: What is the justification/authority for closing routes? The BLM cannot close routes because many are RS 2477 assertions. What happens to the routes that are not designated open? How will enforcement of these closures be handled?

RESPONSE: This Plan closes all routes, unless the BLM designates a route open or unless a Federal Land Policy and Management Act (FLPMA) Title V right-of-way is granted which would allow limited use of a route by the permitted party (43 USC sections 1761-1771). The authority for this action is FLPMA, sections 102(a)(8), 202, and 302 [43 USC sections 1701(a)(8), 1712 and 1732]. This authority is subject to valid existing rights (VER), including valid RS 2477 claims, which would be determined on a case-by-case basis. The BLM will exercise its authority to close routes after compliance with the FLPMA land use planning process found at 43 USC 1712 (regulations found at 43 CFR Part 1600) and NEPA (42 USC section 4321-4345).

As soon as this Proposed Plan is formally approved, all routes not on the transportation system (Map 2.1) would be considered closed. A discussion of the enforcement strategy can be found in the **Enforcement** section in Chapter 2 in this Plan.

ACC-11

COMMENT: Allow for maintenance and construction of new trails in all zones as long as there are no impacts.

RESPONSE: A range of trails could be developed for a variety of purposes, as stated in the **Facilities** section in Chapter 2 of this Plan. In the Frontcountry Zone, a full range of trails could be developed and maintained in

order to provide opportunities for visitors or to protect Monument resources. In the Passage Zone, trails could be developed and maintained where needed for protection of Monument resources, for public safety, or to interpret Monument resources. Focusing the development of new trails to provide visitor opportunities in the Frontcountry and Passage Zones is part of the overall strategy to protect resources by directing developed recreational opportunities to the periphery of the Monument. Elsewhere, trails could only be developed or maintained where necessary to protect Monument resources.

ACC-12

COMMENT: How will routes be maintained, and how will safety be handled? Various comments were submitted on route maintenance, ranging from requests to pave or upgrade certain routes to requests not to upgrade any routes.

RESPONSE: Each comment on route maintenance was considered in developing a maintenance strategy. The BLM is not proposing to pave any routes within the Monument. Refer to the **Maintenance** section in Chapter 2 of this Plan for a discussion of the proposed maintenance levels. Safety is an important concern on routes within the Monument. Many techniques such as speed limits, warning signs, and repair of washout prone areas would be used to promote safe use of routes.

ACC-13

COMMENT: There were various comments that addressed the impact analysis in relation to OHV and the transportation networks for the alternatives. These included:

A. Analysis of leaving roads open and closing roads was not provided in the DEIS, including the justification of administrative routes.

B. The analysis provided in the DEIS only covers impacts from OHV use and does not take into account impacts from increased visitor activities such as hiking and backpacking.

C. The DEIS was inaccurate in stating that impacts of vehicles on relict plant communities would be the least in Alternative D.

RESPONSE:

A. Leaving open existing routes is a current condition and not an action under this Plan. The only route actions being considered are route closures, which differ by alternative in the DEIS. The impacts of those closures were discussed in Chapter 4 of the DEIS and in Chapter 3 of this Plan. In response to public comment and new information, additional analysis of routes in relation to Monument resources has been completed and is provided in ACC-14. This additional analysis, and the analysis in this Plan, includes impacts from administrative routes

on various resources. More information concerning administrative routes is provided in ACC-24.

B. The analysis in the DEIS does include a discussion of impacts from activities other than OHV use on Monument resources. All actions which cause surface disturbance, such as OHV use and visitor use, have the potential to impact Monument resources as discussed in Chapter 4 of the DEIS and in Chapter 3 of this Plan. Both the DEIS and this Plan include discussions of surface disturbing activities that would contribute to impacts on these resources. A reduction of these surface disturbing activities would therefore have the potential of reducing impacts to these resources. Although not all impacts can be attributed to damage from surface disturbing activities, the reduction of these activities in the Monument would contribute to the protection of these resources.

C. The DEIS incorrectly states that impacts to relict plant communities from vehicles would be the least in Alternative D. In fact, none of the alternatives should have projected impacts from vehicles since there are no routes in known relict plant communities. There are routes within ¼ mile of relict plant communities and a discussion of these impacts can be found in Chapter 3 of this Plan. Additionally, a comparison of the DEIS alternatives in relation to relict plant communities and routes can be found in ACC-14.

ACC-14

COMMENT: Why were the impacts of routes on Monument resources not spatially analyzed?

RESPONSE: In response to public comment and new information, more detailed analysis in relation to transportation has been completed for this Plan and is provided in Chapter 3. Additionally, this analysis has been completed for each of the alternatives in the DEIS and is provided in the table below. The relative impact of the alternative transportation networks reported here differs slightly from the relative impacts of the alternatives reported in the DEIS. This is because this analysis is based on more specific aspects of transportation impacts. This would not change the overall relative impact of the alternatives reported in the DEIS, because transportation is only one component of the overall impact analysis. The miles of designated routes in each of the alternatives are provided at the end of this table for comparison purposes.

Resource		Alternative A (no action)	Alternative B (preferred)	Alternative C	Alternative D	Alternative E
Paleontological resources		334 recorded sites within ¼ mile of routes	236 recorded sites within ¼ mile of open routes 76 recorded sites within ¼ mile of admin. routes	235 recorded sites within ¼ mile of open routes 27 recorded sites within ¼ mile of admin. routes	214 recorded sites within ¼ mile of open routes 5 recorded sites within ¼ mile of admin. routes	298 recorded sites within ¼ mile of open routes 8 recorded sites within ¼ mile of admin. routes
Archaeological and Historic resources		1,128 recorded sites within ¼ mile of routes	550 recorded sites within ¼ mile of open routes 126 recorded sites within ¼ mile of admin. routes	662 recorded sites within ¼ mile of open routes 72 recorded sites within ¼ mile of admin. routes	441 recorded sites within ¼ mile of open routes 24 recorded sites within ¼ mile of admin. routes	709 recorded sites within ¼ mile of open routes 16 recorded sites within ¼ mile of admin. routes
Special status plant species	Jones' cycladenia	no routes within 0.3 miles	no routes within 4 miles	no routes within 7 miles	no routes within 7 miles	no routes within 0.5 miles
	Kodachrome bladderpod	0.18 miles of open route through population	0.18 miles of admin. route through population	0.18 miles of open route through population	0.18 miles of open route through population	0.18 miles of open route through population
	Ute ladies'-tresses	Burr Trail crosses, but no OHV use	Burr Trail crosses, but no OHV use	Burr Trail crosses, but no OHV use	Burr Trail crosses, but no OHV use	Burr Trail crosses, but no OHV use

Resource		Alternative A (no action)	Alternative B (preferred)	Alternative C	Alternative D	Alternative E
Relict plant communities and hanging gardens		No routes in relict plant communities 861 acres within ¼ mile of routes	No routes in relict plant communities 379 acres within ¼ mile of open routes 92 acres within ¼ mile of admin. routes	No routes in relict plant communities 438 acres within ¼ mile of open routes 14 acres within ¼ mile of admin. routes	No routes in relict plant communities 369 acres within ¼ mile of open routes No relict plant communities within ¼ mile of admin. routes	No routes in relict plant communities 379 acres within ¼ mile of open routes No relict plant communities within ¼ mile of admin. routes
Riparian resources PFC = Proper Functioning Condition NFC = Non-functioning Condition FAR = Functioning at Risk ND = No data available		277.4 miles of riparian are within ¼ mile of routes • 167.7 PFC • 56.1 FAR or NFC • 53.6 ND	51.6 miles of riparian are within ¼ mile of open routes • 15.7 PFC • 14.7 FAR or NFC • 21.1 ND 36.6 miles of riparian are within ¼ mile of admin. routes • 13.5 PFC • 10.7 FAR or NFC • 12.5 ND	69.5 miles of riparian are within ¼ mile of open routes • 23.0 PFC • 20.7 FAR or NFC • 25.9 ND 7.9 miles of riparian are within ¼ mile of admin. routes • 2.0 PFC • 3.8 FAR or NFC • 2.1 ND	55.6 miles of riparian are within ¼ mile of open routes • 14.7 PFC • 17.0 FAR or NFC • 23.9 ND 1.0 mile of riparian are within ¼ mile of admin. routes • 1.0 ND	75.3 miles of riparian are within ¼ mile of open routes • 25.4 PFC • 24.2 FAR or NFC • 25.7 ND 3.1 miles of riparian are within ¼ mile of admin. routes • 0.5 PFC • 1.7 FAR or NFC • 1.0 ND
Wildlife	mule deer	1,459 miles of routes in habitat	555 miles of open routes and 162 miles of admin. routes in habitat	812 miles of open routes and 93 miles of admin. routes in habitat	513 miles of open routes and 19 miles of admin. routes in habitat	808 miles of open routes and 38 miles of admin. routes in habitat
	elk	144 miles of routes in habitat	57 miles of open routes and 4 miles of admin. routes in habitat	72 miles of open routes and 2 miles of admin. routes in habitat	40 miles of open routes and 0 miles of admin. routes in habitat	59 miles of open routes and 0 miles of admin. routes in habitat
	bighorn sheep	112 miles of routes in habitat	42 miles of open routes and 4 miles of admin. routes in habitat	58 miles of open routes and 7 miles of admin. routes in habitat	43 miles of open routes and 1 mile of admin. routes in habitat	62 miles of open routes and 2 miles of admin. routes in habitat
	black bear	110 miles of routes in habitat	49 miles of open routes and 6 miles of admin. routes in habitat	67 miles of open routes and 4 miles of admin. routes in habitat	32 miles of open routes and 0 miles of admin. routes in habitat	52 miles of open routes and 0 miles of admin. routes in habitat
	upland birds	159 miles of routes in habitat	72 miles of open routes and 8 miles of admin. routes in habitat	105 miles of open routes and 1 mile of admin. routes in habitat	73 miles of open routes and 0 miles of admin. routes in habitat	88 miles of open routes and 1 mile of admin. routes in habitat

Resource		Alternative A (no action)	Alternative B (preferred)	Alternative C	Alternative D	Alternative E
Special status animal species ¹ nest sites include peregrine falcon and Mexican spotted owl ² observations include bald eagle, southwestern willow flycatcher and state sensitive species		33 nest sites ¹ within ¼ mile of routes 120 observations ² within ¼ mile of routes	8 nest sites ¹ within ¼ mile of open routes and 3 nest sites within ¼ mile of admin. routes 60 observations ² within ¼ mile of open routes and 11 within ¼ mile of admin. routes	15 nest sites ¹ within ¼ mile of open routes and 1 nest site within ¼ mile of admin. routes 73 observations ² within ¼ mile of open routes and 11 within ¼ mile of admin. routes	11 nest sites ¹ within ¼ mile of open routes and 0 nest sites within ¼ mile of admin. routes 66 observations ² within ¼ mile of open routes and 4 within ¼ mile of admin. routes	15 nest sites ¹ within ¼ mile of open routes and 0 nest sites within ¼ mile of admin. routes 82 observations ² within ¼ mile of open routes and 4 within ¼ mile of admin. routes
Water quality		1,346 places where routes cross riparian areas (The large number of stream crossings in this alternative could be a function of inaccurate route data that has not been verified for Alternative A.)	50 places where open routes cross riparian areas	52 places where open routes cross riparian areas	41 places where open routes cross riparian areas	82 places where open routes cross riparian areas
Air quality		2,073 miles of dirt routes contributing to fugitive dust	724 miles of designated open dirt routes and 310 miles of administrative dirt routes contributing to fugitive dust	1,092 miles of designated open dirt routes and 179 miles of administrative dirt routes contributing to fugitive dust	666 miles of designated open dirt routes and 30 miles of administrative dirt routes contributing to fugitive dust	1,166 miles of designated open dirt routes and 82 miles of administrative dirt routes contributing to fugitive dust
Wild and Scenic Rivers (WSR)		no suitable WSR segments	18 miles of WSR within ¼ mile of designated open routes and 4.5 miles of WSR within ¼ mile of admin. routes	no suitable WSR segments	28.7 miles of WSR within ¼ mile of designated open routes and 1.4 miles of WSR within ¼ mile of admin. routes	23.4 miles of WSR within ¼ mile of designated open routes and 0 miles of WSR within ¼ mile of admin. routes
Route information (for comparison purposes)	administrative		310	179	30	82
	open		818	1,186	760	1,260
	total	2,167	1,128	1,365	790	1,342

ACC-15

COMMENT: Impacts of route closures on recreation activities and other uses such as fuelwood cutting, post cutting, and livestock grazing were not analyzed in the DEIS.

RESPONSE: The primary consideration in management of the Monument, as stated in the **Monument Management Direction** section in Chapter 2 of this Plan, is to protect the frontier character of the Monument and the Monument resources identified in the Proclamation. The rationale for selection of specific routes is discussed in the **Transportation and Access** section in Chapter 2 of this Plan. These factors include: protection of Monument resources, implementation of planning decisions, honoring valid existing rights, providing for the transportation needs of the surrounding communities, and deciding which routes go to specific destinations (overlooks, camping areas, etc.). These same considerations were included in creating the transportation networks for the various alternatives of the DEIS, and varied to provide an array of alternatives as required by NEPA regulations. The number of miles of routes open and closed is discussed in the Environmental Consequences section (Chapter 4) of the DEIS for many resources and uses, including recreation, outfitters and guides, livestock operations, and forestry product collection. These numbers illustrate the number of miles that would no longer be accessible and therefore may have some impact on these

activities. A discussion of impacts to these activities from route closures and other decisions in this Plan is included in Chapter 3.

It is important to note that access for livestock permittees is provided for in the array of administrative routes in each of the alternatives and is discussed on page 2.81 and 2.82 in the DEIS and in the **Transportation and Access** section in Chapter 2 of this Plan. In addition, permittees are provided access for the proper management of livestock grazing operation on allotments. These stipulations are included in permits for each allotment and are evaluated as permits are renewed.

Forestry product collection is currently allowed in two designated areas in the Monument and is described in Chapter 2 in the **Forestry Products** section and on Map 2.2 of this Plan. Access to these areas is provided. Route closures in these areas would not substantially affect these activities.

ACC-16

COMMENT: By concentrating OHV use in a particular area, the BLM is also concentrating damage to the natural resources in that area.

RESPONSE: As stated in the **Transportation and Access** section in Chapter 2 of this Plan, OHV use would be limited to designated routes; no cross-country travel would be permitted. As a general

approach, limiting OHV use to select regularly used routes minimizes the impacts to the region as a whole, and to identified sensitive resources in particular. Limiting OHV use to designated routes concentrates impacts on routes which have already been disturbed and which already have vehicular use. There is also an advantage in limiting OHV use on certain routes, in that it can be better managed and widespread impacts can be avoided.

ACC-17

COMMENT: Explain what is meant by no cross-country travel, and why proposals for cross-country vehicle use for certain areas and purposes will not be considered. Justification for prohibiting cross-country vehicle travel is not adequate. Adaptive management should be used for the management of OHVs as proposed for other activities.

RESPONSE: Impacts from OHV use are evident on the ground in many places within the Monument. (See the **Transportation and Access** section in Chapter 2 for a discussion of OHV and bicycle impacts.) In instances where the authorized officer determines that OHV impacts would occur in the future if not curbed, limitations or closures are allowed as provided in the 43 CFR 8340 Off-Road Vehicles regulations. Monitoring and adaptive management would be used to ensure that OHV use on designated routes continues to be compatible with

resource protection objectives in the Approved Plan.

ACC-18

COMMENT: Various people requested administrative access on specific routes, while others suggested closing specific administrative routes or questioned why administrative routes were needed at all.

RESPONSE: Every individual request for keeping specific administrative routes open or closed was considered and evaluated on the basis of a variety of criteria. As stated in the **Administrative Routes and Authorized Users** section in Chapter 2 of this Plan, the BLM would be responsible for administrative routes which would be limited to authorized users. Administrative routes are existing routes that lead to developments where the BLM or some permitted user must have regular access for operation or maintenance. These authorized developments include such things as powerlines, cabins, weather stations, communication sites, spring developments, corrals, and water troughs. Access on these administrative routes would be strictly limited and would only be granted for legitimate and specific purposes. The BLM would work with authorized users to determine what administrative access is necessary to carry out the provisions of the authorized activity. Authorized users could include grazing permittees, researchers, state or Federal agency personnel, and others carrying out

authorized activities under a permit or other authorization.

ACC-19

COMMENT: The DEIS stated that "The BLM, and Kane and Garfield Counties, would meet periodically to evaluate the routes designated as open for ATV use." Will there be provisions for public involvement when these discussions occur?

RESPONSE: Many public comments were received on the designation of ATV routes, including from Kane and Garfield Counties. After consideration of these comments, in addition to resource management and safety issues, the network of routes designated for ATV use shown on Map 2.1 was developed. Any proposed changes to the ATV routes in the future would provide for public comment and a plan amendment (except when done under an emergency closure), including input from the Counties, as provided for in the public participation provisions of 43 CFR 8340.

ACC-20

COMMENT: Clarify what is meant by "authorized users" as identified in the Management Common to All section of the DEIS. What kind of emergencies and what kind of uses would allow exceptions to zone and off-road vehicle restrictions?

RESPONSE: As discussed in the **Administrative Routes and Authorized Users** section in Chapter 2 of this Plan, administrative routes are existing routes which would be closed to the general public, but lead to developments where the BLM or some permitted user must have access for maintenance or operation. These authorized developments include such things as powerlines, cabins, weather stations, communication sites, spring developments, corrals, and water troughs. Access on these administrative routes would be strictly limited and would only be granted for legitimate and specific purposes. Authorized users could include grazing permittees, researchers, state or Federal agency personnel, and others carrying out authorized activities under a permit or other authorization. As stated in the **Administrative Routes and Authorized Users** section in Chapter 2 of this Plan, limited exceptions to the general management provisions could be granted to authorized users by the Monument Manager. These exceptions could allow off-highway vehicle use, aircraft landing, mechanized access on closed routes, or use of mechanized equipment in closed areas. Exceptions could be made in emergencies (such as search and rescue), or where clearly essential to serve Monument management purposes.

ACC-21

COMMENT: Clarify statement on page 2.15 of the DEIS concerning open and closed route designations: "...approach would be

consistent with that of the State of Utah, the U.S. Forest Service, and other land managers in the area."

RESPONSE: This statement in the DEIS was incorrect. The OHV designations described in the **Transportation and Access** section in Chapter 2 of this Plan are not necessarily the same as those utilized by other land managers in the area. The OHV designations described in this Plan are, however, consistent with standard BLM designations provided for in the 43 CFR 8340 Off-Road Vehicle regulations and the BLM Manual.

ACC-22

COMMENT: The DEIS alternatives do not adequately plan for current and future OHV recreation in the Monument, as required by law. The alternatives should go through a process to designate open, restricted, and closed areas for OHVs.

RESPONSE: As described in the **Transportation and Access** section in Chapter 2 of this Plan, OHV designations of "closed" or "limited to designated routes" would be made in this Plan. These designations are based on resource conflicts and patterns of use, among other issues, and are consistent with BLM-wide OHV designations as provided for in 43 CFR 8340 Off-Road Vehicle regulations and the BLM Manual. The BLM is not required to provide for all categories of designations.

ACC-23

COMMENT: What is the BLM's authority to close OHV trails and cross-country OHV travel without a specific project document?

RESPONSE: The BLM has the authority to make OHV designations in all planning processes. In the Monument, the designations selected are either "closed" or "limited to designated routes" as discussed in the **Transportation and Access** section in Chapter 2 of this Plan. These designations are consistent with standard BLM designations provided for in 43 CFR 8340 Off-Road Vehicle regulations and the BLM Manual. The environmental analysis associated with this Plan serves as the NEPA document for this decision.

ACC-24

COMMENT: How were open routes (public, administrative, ATV) decided?

RESPONSE: As stated in the **Transportation and Access** section in Chapter 2 of this Plan, the BLM was persuaded, as a result of widespread requests in the scoping process and further examination, that proper management of the Monument would be enhanced by making decisions on access and transportation routes in the Plan. The specific routes designated open (for both public and administrative use) in the DEIS alternatives were determined based on a variety of considerations. These

include what is needed to protect Monument resources, implement planning decisions, honor valid existing rights, provide for the transportation needs of surrounding communities, and provide a reasonable range of transportation networks for NEPA analysis purposes. These issues, including public comment were considered in development of the Proposed Plan transportation system. The basic philosophy in determining which routes would be open in the Proposed Plan was to determine which routes access some destination (such as a scenic overlook or a popular camping site) and present no threat to Monument resources. These routes would be open to public use. Routes that were not considered desirable (for resource protection purposes) would not be kept open for public use. Additional routes would be designated open for administrative purposes. See the **Transportation and Access** section in Chapter 2 of this Plan and ACC-20 for a complete discussion on administrative routes and authorized users of these routes. A discussion of the designated routes for ATV use is provided in ACC-4.

ACC-25

COMMENT: Provisions for maintenance of state highways should be addressed, including sources for mineral materials and gravel. The Plan should also address road improvements needed for future increases in traffic.

RESPONSE: The BLM would continue to work with the Utah Department of Transportation concerning route maintenance for Highways 12 and 89 as discussed in the **Maintenance** section in Chapter 2 of this Plan. This would cover maintenance and safety work activities. If BLM approval is required for improvements to Highways 12 and 89 to handle future increases in traffic, those could occur following discussions between the BLM and the State justifying the need for such improvements. Any new ground disturbance would require site-specific environmental analysis.

As discussed in the **Energy and Mineral Activities** section in Chapter 2 of this Plan, the Monument is no longer subject to the issuance of new mineral material permits. However, existing material sites authorized by Title 23 rights-of-way would continue until lands are returned to BLM jurisdiction by the Federal Highway Administration.

ACC-26

COMMENT: How do routes and zones fit together? The zones need to provide for more improvements to routes.

RESPONSE: The management zones described in the **Zone Descriptions** section in Chapter 2 of this Plan help define permitted activities and any stipulations pertaining to them, as well as any excluded activities. Zones describe the character of visitor facilities, activities, etc., which are permitted

within them. Zones do not dictate the class or maintenance level of routes located within them. A discussion of the maintenance level of routes can be found in the **Maintenance** section in Chapter 2 of this Plan.

ACC-27

COMMENT: Impacts from cross-country use and from route use should be analyzed separately.

RESPONSE: The BLM recognizes that vehicle use on routes and cross-country vehicle travel have different impacts on resources and uses. These transportation impacts were analyzed separately in the Environmental Consequences section (Chapter 4) of the DEIS. Chapter 3 of this Plan also includes a separate discussion of these issues and the impacts caused by each.

BIO-1

COMMENT: Explain the State of Utah's role in the management of fish and wildlife within the Monument, including reintroduction and introduction (native and non-native), and hunting and fishing regulations.

RESPONSE: The Proclamation establishing the Monument states: "Nothing in this Proclamation shall be deemed to diminish the responsibility and authority of the State of Utah for management of fish and wildlife, including regulation of hunting and fishing,

on Federal lands within the Monument." As stated in the **Fish and Wildlife** section in Chapter 2 of this Plan, the BLM has the responsibility to manage the habitat that supports fish and wildlife species. The BLM's objective in managing habitat would be to work in conjunction with the Utah Division of Wildlife Resources (UDWR) in managing fish, wildlife, and other animals to achieve and maintain natural populations, population dynamics and population distributions in a way that protects and enhances Monument resources. To meet these objectives, the BLM would manage habitats for the recovery or re-establishment of native populations through collaborative planning with UDWR and others.

BIO-2

COMMENT: Various clarifications about invertebrates, birds, and sensitive fish species were requested. These included:

A. Is Appendix 15 a literature search, or is this a result of actual surveys, and why are there no mollusks listed?

B. Appendix 15 has the wrong genus and species names for Brewer's blackbird and for the mallard (pages A15.1 and A15.6). Brewer's blackbird should be *Euphagus cyanocephalus* instead of *Euphagus carolinus*. Mallard should be *Anas platyrhynchos* instead of *Anas platyrinos*.

C. There is one UDWR threatened raptor (ferruginous hawk) using the Monument that was not recognized in the DEIS.

D. Appendix 16 (page A16.4) erroneously lists the Colorado squawfish and the razorback sucker as being in the Monument.

RESPONSE:

A. The list of invertebrate species was derived by a literature search conducted by the Utah Natural Heritage Program. "Invertebrates of the Grand Staircase-Escalante National Monument: A Review," William R. Bosworth, III and George V. Oliver, Cooperative Agreement Number UT040-A8-0002, August 31, 1998.

A complete species list of invertebrates was not available at the time the DEIS was printed, therefore only a summary sheet was included. The invertebrate list compiled from the literature search is available on the Monument website or can be provided by request. No crustaceans have been reported in the literature for the Monument.

B. The scientific names used for Brewer's blackbird and for the mallard in the DEIS are in error and are corrected as written above in the Errata at the end of this document.

C. The ferruginous hawk is identified as a State and BLM sensitive species in Appendix 15 (page 15.5) and Appendix 16 (page A16.2) in the DEIS.

D. The Colorado squawfish and razorback sucker are not found within the Monument at the present time, but are found in the Lake Powell system, of which the Escalante River is a part.

BIO-3

COMMENT: Clarify the reseeding policy following fires.

RESPONSE: Reseeding after fires would be used in specific circumstances as described in the **Reseeding After Fires** section in Chapter 2 of this Plan. Native plants would be used as a priority in all except emergency situations, in instances where reseeding was determined necessary. All reseeding efforts must meet the overall objective for vegetation to be managed to achieve a natural range of native plant associations.

BIO-4

COMMENT: What are the different types of vegetation manipulation, and why does it appear that some alternatives allow more than others. Clarify your strategy for control of noxious weed species and the use of non-native plants. Impacts of vegetation restoration and the use of non-natives (seeding) need to be discussed.

RESPONSE: Some form of vegetation manipulation (chemical, biological, mechanical or management ignited fire) was allowed in the DEIS in all but two zones of

two alternatives. Other zones restricted these activities to specific methods (e.g., biological) or for specific purposes (i.e., for protection of Monument resources). Determinations of which methods would be used in the different zones and alternatives was representative of the alternative and zone philosophies and provided a range of alternative management scenarios for impact analysis purposes. None of the alternatives discuss the amount of vegetation manipulation that would be allowed since site specific recommendations for vegetation restoration are not proposed. The **Vegetation** section in Chapter 2 of this Plan provides objectives for vegetation management within the Monument. Vegetation restoration methods are discussed under the **Vegetation Management** section in Chapter 2. These sections define the terms, provide examples of each method, and describe when methods are restricted to specific circumstances.

The Monument would have a noxious weed control program that is described in the **Noxious Weed Control** section in Chapter 2 of this Plan. Through cooperation with adjacent agencies and the Counties, the BLM is dedicated to control noxious weeds in and around the Monument.

Native plants would be used as a priority in all vegetation projects. This policy is described in the **Native vs. Non-native Plants** section in Chapter 2 of this Plan.

As stated in this Plan, vegetation restoration methods would only be used as a tool to meet the overall vegetation management objective - to achieve a natural range of native plant associations. It goes on to state that management activities would not be allowed to significantly shift the makeup of those associations, disrupt their normal population dynamics, or disrupt the normal progression of those associations. With this in mind, any vegetation restoration projects would be required to have beneficial effects to the vegetation associations. General discussions of vegetation management impacts (including the use of non-natives) are discussed in Chapter 3 of this Plan. More specific project level NEPA analysis would be completed prior to the use of vegetation restoration in the Monument.

BIO-5

COMMENT: Clarify the fuelwood cutting policy and locations.

RESPONSE: As stated in the **Forestry Products** section in Chapter 2 of this Plan, fuelwood cutting is currently allowed in two areas of the Monument (Rock Springs Bench and Buckskin Mountain). These areas are shown on Map 2.2. Other areas of the Monument may be considered for fuelwood cutting if determined necessary to achieve the overall vegetation management objective. Use of vehicles in association with fuelwood cutting areas would follow the same

restrictions as other uses as described in Chapter 2 of this Plan.

BIO-6

COMMENT: Are there restrictions placed on activities to protect wildlife and plants?

RESPONSE: This Plan describes specific restrictions as they relate to certain activities. These can be found in the **Fish and Wildlife, Vegetation Management, and Special Status Animal and Plant Species** sections of Chapter 2. The **Zone Descriptions** section also provides information on restrictions on activities. Protection of wildlife and plants in the Monument is a primary concern in the management of the Monument. In general, if activities are determined to be harming wildlife or vegetation, restrictions would be imposed to minimize or eliminate these impacts. Standard protection zones exist for some listed animal species for protection from specific activities. These are discussed in the **Special Status Animal Species** section in Chapter 2 of this Plan.

BIO-7

COMMENT: What restrictions are proposed to protect unique sensitive resources such as relict plant communities?

RESPONSE: Unique and isolated vegetation communities such as relict plant areas and hanging gardens, as identified in the Proclamation, were a primary concern in

development of this Plan. Specific restrictions for these areas are mentioned in the **Relict Plant Communities and Hanging Gardens** section in Chapter 2 of this Plan. These areas would be protected from any surface disturbing activity or any activity that may directly or indirectly impact the site. Non-surface disturbing research would be encouraged as it would increase our knowledge of these unique associations.

BIO-8

COMMENT: Is there more information regarding the protection and management of Federally listed endangered and threatened species, as well as sensitive species?

RESPONSE: Information on the management of listed and sensitive species is provided in the **Special Status Animal Species** and **Special Status Plant Species** sections in Chapter 2 of this Plan. This discussion includes information that is common to all species, as well as information that is specific to each. The BLM is dedicated to the recovery and conservation of all listed species as well as species that are considered sensitive by the State of Utah. Cooperating with State and other Federal agencies is an integral part of sensitive species protection.

BIO-9

COMMENT: Clarify the fire management policy. Why would fire suppression take place in Wilderness Study Areas (WSAs)?

RESPONSE: The objective of fire management in the Monument is to allow fire to play its natural role in the ecosystem. All fire activities would be coordinated with the Color Country Fire Management Area as described in the **Wildfire Management** section in Chapter 2 of this Plan. As outlined in the Color Country Fire Management Operating Plan, fire would be allowed to play its natural role in the ecosystem in most areas of the Monument. Areas with facilities, private property, or areas where public safety is a concern may have fire suppression activities. Other areas for fire suppression activities may be identified for the protection of wood structures in historic or archaeologic sites. Changes in the current fire management zone prescriptions may be modified through the fire planning process. Heavy equipment use is only allowed through authorization of the Monument Manager. Fire would be allowed to play its natural role in WSAs, except where noted in the Color Country Plan for the protection of private property or other features. A fire resource advisor familiar with WSA issues would be consulted on all fires within the Monument that involve WSAs.

BIO-10

COMMENT: The Plan should provide more specific information on fish in order to assess the effects of proposed actions. The BLM should also coordinate with adjacent land management agencies where pertinent to fisheries management. The BLM should correct inaccuracies, such as identifying the presence of Bonneville cutthroat trout in the West Fork of Boulder Creek.

RESPONSE: While the DEIS does not specifically address fish management, it does address the habitat components (i.e., water quality and riparian areas) that affect fish. Proposed decisions in the DEIS and Proposed Plan (e.g., water quality, riparian, limiting surface disturbing activities, and Wild and Scenic River determinations) provide protection for fish and fisheries habitat. The BLM will continue to coordinate with the UDWR, the U. S. Forest Service, and Glen Canyon National Recreation Area where common management of river systems and associated wildlife, including fish, occur. Corrections to inaccuracies, such as the inaccurate reference to Bonneville cutthroat trout (should be Colorado cutthroat trout) found in the DEIS, are identified in the Errata at the end of this document.

BIO-11

COMMENT: The DEIS does not address aquatic communities in the Monument.

RESPONSE: The BLM recognizes the importance of aquatic resources in the Monument. Riparian and wetland systems provide habitat for plants and animals, especially in areas such as the Monument where water is a limited resource. These systems are also some of the most easily affected resources in arid ecosystems due to competing recreation, livestock and wildlife use and dependence on water. Protection of these areas is discussed in the **Riparian** section in Chapter 2 and is further discussed in the **Strategy for Assuring Water Availability** section in Chapter 2 of this Plan. Water quality monitoring, which is also described in the **Water** section in Chapter 2 of this Plan, is an ongoing program which would eventually include monitoring of aquatic invertebrates and key indicators of water quality such as algal communities. These issues would also be vital in the study of hanging gardens. At the time of plan preparation, the only UDWR management plan for aquatic communities in the Monument was in the Aquatic Management Plan Escalante River Drainage Hydrologic Unit. This Plan discusses fish, amphibians, and reptiles. As stated in the **Fish and Wildlife** section in Chapter 2 of this Plan, the BLM would work closely with the UDWR in the management of wildlife species in the Monument. Protection of aquatic resources in the Monument, and the maintenance of healthy aquatic systems, are a priority in management of this area.

BIO-12

COMMENT: Clarify the use of Proper Functioning Condition assessment for riparian areas in the Monument.

RESPONSE: Proper Functioning Condition (PFC) assessment protocols were developed to provide standardized assessment of riparian areas on public lands. The BLM uses this process to evaluate three component of a riparian-wetland area: (1) vegetation, (2) landform/soils, and (3) hydrology. Although the standard protocols do not include evaluation of special status species habitat or ecological processes, these would be evaluated in all future riparian assessments. This is because the recently adopted Utah Standards and Guidelines for Healthy Rangelands require evaluation of special status species habitat and ecological processes during assessments. Since the current PFC inventory was completed prior to implementation of the new Utah Standards and Guidelines for Healthy Rangelands, these issues were not considered during evaluation. All segments of riparian habitat previously inventoried are scheduled to be reassessed as part of the allotment assessments. Furthermore, riparian areas that have not been evaluated are scheduled for assessments within the next three years. Proposed actions in this Plan would contribute to an upward or static, rather than a downward trend in PFC class as outlined in the Utah Standards and Guidelines for Healthy Rangelands. This is

true for all of the alternatives in the DEIS as well as this Proposed Plan.

BIO-13

COMMENT: There are no benefits listed in the DEIS from water developments constructed for wildlife.

RESPONSE: Impacts of water developments were discussed throughout the Environmental Consequences section (Chapter 4) of the DEIS. Although not specifically discussed, there are potential benefits derived from livestock water developments if they are constructed in such a way as to provide accessible water to wildlife. If the water is not accessible to wildlife or transported by pipeline where wildlife use the water, then water developments could be a detriment. Specific impacts to wildlife would be assessed through project-level environmental analysis as specific projects are proposed.

BIO-14

COMMENT: Clarify the Monument's role in providing landscape connectivity for wildlife. How will the Monument work with adjacent agencies on landscape connectivity issues?

RESPONSE: The zones in this Proposed Plan provide for linkages between adjacent agency lands by protecting large undisturbed or primitive areas. These areas include riparian, as well as upland habitat for wildlife species.

Interagency coordination and cooperation are integral to management of biological resources in the Monument. Many programs described in this document include interagency coordination in their discussions. Examples from the following sections in Chapter 2 of this Plan include: **Fish and Wildlife, Noxious Weed Control, Wildfire Management, and Special Status Plant Species and Special Status Animal Species**. In addition to these discussions, there is an effort to coordinate research activities with adjacent agencies, as described in the **Science and Research** section in Chapter 2 of this Plan. All of these activities demonstrate the BLM's commitment to interagency coordination and landscape resource management.

BIO-15

COMMENT: How will the Executive Order for Invasive Species be incorporated in this Plan?

RESPONSE: On February 3, 1999 the President issued Executive Order 11312 regarding invasive species management on Federal lands. Invasive species management issues in the **Noxious Weed Control and Native Vs. Non-native Plants** sections in Chapter 2 of this Plan incorporate provisions from this Executive Order and describe how the Monument would prevent the introduction of invasive species and would work to remove invasive species that are currently present.

BIO-16

COMMENT: Impacts on wildlife were not analyzed in relation to routes.

RESPONSE: General analysis of wildlife impacts from route closures was provided in Chapter 4 of the DEIS. In response to comments, additional information has been analyzed and provided in the impact analysis in Chapter 3 of this Plan. Additionally, information regarding wildlife and the different route networks for the DEIS alternatives has been completed and is provided in ACC-14.

GEN-1

COMMENT: Explain the animal damage control policy and how these activities will be dealt with in the future. Comments on animal damage control ranged from "don't allow any animal damage control including mountain lions and bears," to "predator control is an important part of proper livestock management," and "predator control should be used only for human safety."

RESPONSE: As stated in the **Wildlife Services** section in Chapter 2 of this Plan, Wildlife Services (formerly Animal Damage Control) activities within the Monument would be limited to the taking of individual coyotes within the immediate vicinity after verified livestock kills, where reasonable livestock management measures to prevent predation had been taken and had failed.

Reasonable livestock management measures could include experimental, preventive measures to manage livestock for less predation. No traps, poisons, snares, or M44s would be allowed in the Monument due to safety concerns and potential conflicts with Monument resources. Pursuant to the Proclamation, bear and mountain lion populations are managed under State regulations for wildlife through the UDWR. This includes regulations for hunting and regulations covering depredating bears and mountain lions.

GEN-2

COMMENT: Filming restrictions in the DEIS are not clear in regards to who they apply to and what constitutes commercial and minimum impact filming.

RESPONSE: Commercial filming activities that require a permit (and payment of fees) include:

- commercial moving photography - motion pictures, television, car and other product commercials, documentaries, etc. (From 8/10/94 letter signed by the Acting BLM Director, and IM UT 96-15 dated 12/14/95).
- commercial still photography - advertisements, brochures, calendars, postcards, books, photographing public land users to sell pictures to those same users, photography featuring a commercial

product for sale using Monument lands as a background (such as fashion shoots or magazine advertisements), or any activity whereby the photographer is under contract to sell his/her photos (From 8/10/94 letter signed by the Acting BLM Director, and IM UT 96-15 dated 12/14/95).

All commercial filming activities permitted in the Monument must be "minimum impact." Minimum impact filming has a specific definition in regards to activities and impacts to resources as described in the **Commercial Filming** section in Chapter 2 of this Plan. Instruction Memorandum No. 94-59 (11/12/93) and 43 CFR 2929.2-2 provide the basis for determining minimum impact permits.

Many photographers (both professional and amateur) are allowed to take still photographs without a permit or the payment of any fees. Visitors using cameras and/or recording devices for their own personal use are also not required to obtain a permit. All filming activities would have to comply with zone prescriptions.

GEN-3

COMMENT: Protecting wilderness character is the original intent of the designation of the Monument.

RESPONSE: The Presidential Proclamation establishing Grand Staircase-Escalante National Monument (GSENM) states "The

Grand Staircase-Escalante National Monument's vast and austere landscape embraces a spectacular array of scientific and historic resources" and specifically notes that the Monument was "set apart and reserved" for the "purpose of protecting the objects identified." The Proclamation also states that the remote and undeveloped character of the Monument is responsible for the continued existence and quality of most of the scientific and historic resources described. The BLM recognizes that safeguarding the remote and undeveloped character of the Monument is essential to the purposes for which the Monument was created and this is recognized in the DEIS and this Proposed Plan. However, recommendations for Wilderness designation or the addition of new Wilderness Study Areas is beyond the scope of this Plan as discussed in **The 1999 Utah Wilderness Inventory and Section 202 Planning Process** section in Chapter 2 of this Plan.

GEN-4

COMMENT: There is an egregious error in math on page S.27 under Alternative C in the DEIS.

RESPONSE: This error has been corrected and is shown in the Errata at the end of this document.

GEN-5

COMMENT: How are overflights, aircraft landing, and natural quiet addressed?

RESPONSE: The DEIS contained a section on aircraft operations at page 2.75. This Proposed Plan contains a more detailed discussion of aircraft operations, aircraft landing, and noise baseline studies in the **Aircraft Operations** section in Chapter 2.

GEN-6

COMMENT: Valid Existing Rights (VERs) should have been considered as a significant decision in the DEIS.

RESPONSE: The Presidential Proclamation which established the Monument states "The establishment of this monument is subject to valid existing rights." The DEIS and this Proposed Plan therefore do not make specific decisions concerning VERs which may be asserted in the future under various existing authorities. Instead, the BLM would periodically verify the status of VERs and when an action is proposed pursuant to any of them, the BLM would analyze the actions potential impacts in order to provide a basis for decision making as discussed in the **Valid Existing Rights and Other Existing Authorizations** section in Chapter 2. For this reason, VER management was not listed as a significant decision in Chapter 1 in the DEIS.

GEN-7

COMMENT: Some people commented that the Plan should address new coal and mineral leasing, while others commented that new

leasing should not be allowed and that existing leases should be purchased. How are VERs addressed in the Plan? Why were no additional restrictions placed upon them? How will potential conflicts between Plan objectives and VERs be handled? How will access for VERs be provided?

RESPONSE: No new coal or other mineral leasing will occur within the Monument because the Proclamation withdraws the Monument from the location of new mining claims and new mineral leasing. The Proclamation also states that "The establishment of this monument is subject to valid existing rights." VERs are discussed in detail in the **Valid Existing Rights and Other Existing Authorizations** section in Chapter 2 of this Plan. This section covers the treatment of proposed activities that may conflict with Monument resources. This section also includes a discussion of Standard Lease Terms and mentions that they can be modified by special or supplemental stipulations and that conditions of approval can be developed on site specific applications to meet other resource concerns. The BLM would consider the use of special stipulations or other permit conditions on a case-by-case basis to protect Monument resources. In addition, the purchase, where authorized, or exchange of existing mineral interests to protect Monument resources may be considered by the BLM on a case-by-case basis. To the extent that holders of VERs are entitled to reasonable access, the BLM would work with the holder of the VER to provide

access consistent with the Proclamation and to assure that VERs are not impaired.

GEN-8

COMMENT: Explain why there is no full field development. Why are coalbed methane resources not covered?

RESPONSE: Full field mineral development of new and existing Federal mineral leases was not analyzed as a separate alternative in the DEIS for several reasons:

- The Monument proclamation closed the Monument to Federal mineral leasing or other disposition of Federal minerals.
- From a mineral resource perspective, the probability of successful development from exploration to full field development of mineral resources is low. Recent exploratory oil and gas wells in and around the Monument have not disclosed the existence of commercially recoverable quantities of oil and gas. As to coal, although the resources exists on leases within the Monument and development is legally permissible, the economics of producing and transporting coal to distant markets without established infrastructure makes future development speculative. This conclusion is supported by recent analysis of existing coal leases. As to coalbed methane, because new mineral leasing is not allowed within the Monument which would provide existing coalbed methane leases the opportunity to expand and consolidate holdings, it is not

clear that current coalbed methane leases can be commercially developed. Further, it is not clear that there have been confirmed commercially recoverable amounts of coalbed methane within the Monument, and until that occurs development would be speculative.

- Insufficient information is currently available to analyze the likely impacts of full field development.
- Direct, indirect, and cumulative analysis would be required and would occur at the time that any mineral development is specifically proposed.

This staged approach to NEPA compliance has been upheld by the 10th Circuit in Park County Resource Council v. USDA 817 F2d 609 (10th Cir 1987). Such an approach does not constitute "piecemealing" of a larger project. This Plan is independent of, and does not pre-determine, the result of any future application for permit to drill (APD) or development proposal. NEPA compliance would be conducted at such time that any future proposal is made; adequate information would then exist to identify precisely the proposed activities and to analyze the proposal and its impacts. The Interior Board of Land Appeals has upheld approval of an APD for an exploratory well without analysis of full field development (see Utah Chapter of Sierra Club, 120 IBLA 229).

GEN-9

COMMENT: Explain how local interests are incorporated into the Plan.

RESPONSE: The DEIS contains a section on Communities in Chapter 2 (page 2.76). That section states that the BLM has a strong commitment to work with communities in managing the Monument, as already demonstrated in ongoing efforts to consult with communities on planning and provide communities with financial assistance on planning issues associated with the Monument. It goes on to state that the BLM will work with communities and utility companies on infrastructure needs, and commits the BLM to participation in community organizations and regional coordination groups. Major visitor facilities would be located in the communities to facilitate community involvement in visitor services. Further, local elected officials from each county would be represented on the GSENM Advisory Committee. Specific direction for activities such as fuelwood cutting and collections, and cooperation with communities are addressed in Chapter 2 of this Plan.

GEN-10

COMMENT: Animal and Plant Health Inspection Service (APHIS) was not consulted in the EIS process.

RESPONSE: Under a National Memorandum of Understanding (MOU) between Wildlife Services and the BLM, the BLM is committed to working with "APHIS-Animal Damage Control to identify areas on BLM lands where mitigation or restrictions may be needed to comply with BLM's Resource and Management Framework Plans." The BLM considers the Monument a place where restrictions are appropriate, and they are reflected in this Plan. The BLM will continue to discuss appropriate animal damage control activities with Wildlife Services in the annual review of wildlife damage management plans to ensure that they are consistent with this Plan. Under the MOU, the BLM is not required to consult with APHIS on the development of specific proposals for the DEIS.

GEN-11

COMMENT: Explain Class I airshed designations. It was suggested that the Monument pursue Class I designation and that impacts on air quality from the alternatives were not considered and models/formulas were not used to assess air quality impacts. Others suggested the Class II designation should be maintained.

RESPONSE: The Clean Air Act of 1977 established three air quality classes for Prevention of Significant Deterioration. The Act established all National Parks of a particular size (5,000 acres or more) as mandatory Class I areas; all five National

Parks in Utah are Class I areas. As stated on page 3.14 of the DEIS, the entire Monument is classified as a Class II area. To change an area from one classification to another, the Utah Air Quality Board submits a recommendation to the Governor. This process is the responsibility of the State.

After reviewing comments on air quality, including suggestions that the Monument pursue Class I status, and after considering potential benefits to resources, the BLM has decided not to pursue Class I designation for the Monument. Class II status is sufficient to protect air quality within the Monument since this Plan does not propose any actions that are expected to affect air quality standards. The presence of Class I areas surrounding the Monument affords additional protection. As stated in the **Air Quality** section in Chapter 2 of this Plan, all actions and authorizations would be designed or stipulated so as to protect air quality within the Monument and the Class I areas surrounding the Monument.

A discussion of impacts on air quality is included in Chapter 4 of the DEIS and in Chapter 3 of this Plan. Specific formulas and models were not used for this analysis because the BLM is not proposing any actions that would significantly affect air quality (only temporary localized increase in fugitive dust from construction and vehicle use). In addition, sufficient vehicle use data are not available to estimate levels of such temporary increases. While ongoing monitoring of air quality is not occurring, the

State of Utah categorizes the Monument as an attainment area and estimates air quality pollution to be low.

GEN-12

COMMENT: The Monument should be designated Visual Resource Management (VRM) Class I, especially Wilderness Study Areas. The VRM Class IV should not be a designation in the Monument.

RESPONSE: The VRM classes are discussed in Chapter 2 of both the DEIS and this Plan. As discussed, VRM classes in the DEIS were based on an inventory updated after designation of the Monument. Based on public comment, including the suggestions above, and re-evaluation of visual resource management objectives, the VRM Class IV areas (where major modification of the existing character of the landscape are allowed) have been integrated into surrounding classes for this Plan. Should portions of the Monument be designated Wilderness or added to the Wild and Scenic River system, the VRM Classes for these lands would be changed to VRM Class I.

GEN-13

COMMENT: Explain the composition and role of the advisory committee. Will there be more than one group?

RESPONSE: The **GSENM Advisory Committee** is discussed in Chapter 2 of this

Plan. One advisory committee is proposed and would be charted under the Federal Advisory Committee Act (FACA). This committee would advise on science related matters and on progress in meeting management plan objectives in the Monument. The make-up of the committee is also discussed in the **GSENM Advisory Committee** section in Chapter 2 of this Plan.

GEN-14

COMMENT: There is no table showing how the DEIS complies with Federal regulations and executive orders. Executive Order 11988 is not mentioned in the DEIS.

RESPONSE: Chapter 1 of both the DEIS and this Plan discusses the major laws, regulations, and criteria with which this Plan must comply. A table of Federal regulations and executive orders, along with how the various alternatives comply with each, was not included in the DEIS because all alternatives must comply with applicable laws, regulations, and executive orders. To list each one individually would unnecessarily enlarge the document.

Page 4.53 of the DEIS stated that "there are no floodplains associated with large rivers in the Monument." However, after consulting the Federal Emergency Management Agency maps which show the location of special flood hazard areas (floodplains), it was determined that there are a number of floodplains within the Monument. Therefore,

a policy on floodplains is included in the **Facilities** section in Chapter 2 and in the **Issues Considered but not Analyzed in Detail** section in Chapter 3 of this Plan. In accordance with Executive Order 11988 (Floodplain Management), these sections state that no projects or activities that would result in permanent fills or diversions in, or placement of permanent facilities on special flood hazard areas, would be proposed within the Monument.

GEN-15

COMMENT: How does the Proposed Plan address cultural and historic resources? More emphasis should be placed on cultural and historic resources.

RESPONSE: The BLM recognizes the importance of cultural and historic resources to the cultural heritage of the local communities and Native American Indian communities. The objectives set out in the **History** and **Archaeology** sections in Chapter 2 of this Plan are established to support the preservation, study, and appreciation of the cultural and historic resources and the cultural heritage of the peoples of the region. The BLM is committed to the continuing consultation with Native American Indian communities and to continuing and building on the collaborative history programs already initiated in the local communities. For example, the BLM is involved in an ongoing Oral History Program in cooperation with local communities. The Oral History

Program focuses on the collection of histories from local residents and others knowledgeable about the region in order to increase understandings of the interactions between people and the environment of the Monument.

GEN-16

COMMENT: Clarify "multiple use" as it relates to the Monument. Multiple use should be emphasized.

RESPONSE: The term "multiple use" is defined in Section 103 (c) of FLPMA. FLPMA defines multiple use as the "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic output or the greatest unit output." A discussion of multiple use was included in the DEIS on page 1.1 and is included in Chapter 1 of this Plan. The Proclamation that established the Monument governs how the provisions of FLPMA (including multiple use) will be applied within the Monument, since the Proclamation withdraws some uses (e.g., mineral entry) and states that some uses will continue to be managed under existing laws (e.g., grazing). The Proclamation also dictates that the BLM protect the spectacular array of scientific, historical, biological, geological,

paleontological, and archeological objects for which the Monument was created. The multiple uses that occur on the Monument must meet this requirement.

GEN-17

COMMENT: A word is missing on page A6.1 in the Areas of Critical Environmental Concern discussion.

RESPONSE: The missing words are "these resources." This correction is noted in the Errata at the end of this document.

GEN-18

COMMENT: There is a factual error in the DEIS (page 3.56 within the section heading of Oil and Gas) regarding testing of the Conoco, Inc. Reese Canyon State 32 well.

RESPONSE: This error has been corrected and is shown in the Errata at the end of this document.

GEN-19

COMMENT: Will there be Research Natural Areas designated in the Monument?

RESPONSE: One Research Natural Area existed prior to Monument designation. This is the No Mans Mesa Research Natural Area, designated in 1986. The DEIS recommended that this designation continue. Designation of additional Research Natural Areas is not

being recommended in this Plan. The focus of the entire Monument is on the protection of the resources identified in the Proclamation and on the appropriate study of these resources. Therefore, the use of Research Natural Areas as a management tool for further areas is not considered necessary.

GEN-20

COMMENT: How were unavoidable adverse impacts addressed?

RESPONSE: While there is not a specific section titled "Unavoidable Adverse Impacts" in the DEIS, these impacts are included throughout Chapter 4 in the impacts discussion. All adverse impacts discussed, particularly those remaining after application of mitigation measures, constitute unavoidable adverse impacts. The alternatives analyzed in the DEIS and this Plan/Final Environmental Impact Statement (FEIS) represent the range of mitigation measures to lessen adverse impacts.

GEN-21

COMMENT: Mitigation measures that are proposed in several places in the DEIS should be better defined.

RESPONSE: The prescriptions and zone features of the alternatives in the DEIS are in themselves alternative mitigation measures to protect Monument resources. These measures were discussed throughout Chapter

4 of the DEIS as eliminating or lessening impacts to resources. The mitigation features of this Plan are also specifically discussed throughout Chapter 3. Additional mitigating measures mentioned in both the DEIS and this Plan/FEIS documents would be developed in subsequent project level NEPA analysis.

Monitoring of all mitigation strategies is integral to the protection of Monument resources. Information gained from this monitoring would be part of the adaptive management framework discussed in Appendix 3 of this Plan.

GEN-22

COMMENT: How will the BLM handle oil and gas exploration and drilling? Why are impacts from these activities not analyzed for cumulative effects or direct and indirect effects?

RESPONSE: A general discussion of impacts from current operations was included in the Cumulative Impacts section of the DEIS, page 4.49. This Plan also includes a general discussion of these activities in the **Cumulative Impacts** section in Chapter 3. Direct, indirect, and cumulative impacts from future oil and gas development are not analyzed in detail in this Plan because the BLM does not view such development as reasonably foreseeable. Although not legally precluded, assuming the lessees have valid existing rights, future oil and gas

development appears speculative. A number of oil and gas exploratory wells have been drilled in and around the Monument without the discovery of commercially recoverable amounts of oil and gas. If commercially recoverable amounts of oil and gas are discovered, the impacts would be analyzed in future NEPA documents.

GEN-23

COMMENT: The Proposed Plan should include an analysis to address the cost of implementation of each of the alternatives.

RESPONSE: When this Proposed Plan and the alternatives in the DEIS were developed, the BLM considered what would be reasonable to expect in terms of future budgets for enforcement, mitigation, and other implementation measures. While one aspect of implementation may be more costly in a certain alternative, there are generally other aspects that may be less costly. For example, enforcement measures may be more costly in one alternative where more restrictions are used, while provision of visitor amenities might be less costly. Overall, the alternatives were designed to be realistic in terms of budget needs.

A detailed analysis of the cost of each alternative is unnecessary because the consideration of lowest cost is not a factor in selecting a proposed plan. The least expensive alternative would not always best meet the requirements of the Proclamation,

FLPMA, and other laws, so budget costs were not considered necessary to the planning process.

GEN-24

COMMENT: Explain the "adaptive management" process. How will monitoring be incorporated into management?

RESPONSE: The BLM realizes the importance of developing monitoring and adaptive management measures for protection of Monument resources. These programs would ensure that the most current scientific understanding is applied to the protection and management of Monument resources. The **Implementation and Adaptive Management Framework** in Appendix 3 of this Plan describes the process of how objectives would be established, monitored, and evaluated to ensure protection of resources based on new data and information. The GSENM Advisory Committee would be an integral part of the adaptive management process. In Chapter 2 of this Plan, the **GSENM Advisory Committee** section discusses their role in advising Monument management on science related matters and efforts to meet plan objectives.

GEN-25

COMMENT: Explain how the Plan affects/addresses private property within the Monument boundary.

RESPONSE: This Plan applies only to public land within the boundaries of the Monument; it does not apply to private lands. However, as stated in the **Other Existing Rights or Interests** section in Chapter 2 of this Plan, the presence of private lands within the Monument has implications for public land because landowners are entitled to reasonable access to their land. Such access is subject to the rules and regulations governing the administration of public land. The BLM has discretion to evaluate and consider such things as proposed construction methods and location, reasonable alternatives, and reasonable terms and conditions as are necessary to protect the public interest and Monument resources.

GEN-26

COMMENT: Clarify the Areas of Critical Environmental Concern (ACEC) process. If ACECs are not designated, how will areas nominated for ACECs be protected? Why was the Scenic Route nomination not included in the list of nominations in Appendix 6, page A6.2? Why weren't the Outstanding Natural Areas (ONA), Research Natural Areas (RNA), and Wolverine Petrified Forest Area (WPFA) included in the ACEC nominations?

RESPONSE: Areas of Critical Environmental Concern are areas within the public lands where special management attention is required to protect and prevent irreparable damage to important historic,

cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. The identification of a potential ACECs shall not, of itself, change or prevent change of the management or use of public lands (43 CFR 1601.0-5 and the FLPMA).

The ACEC process is described in Chapter 2, page 2.75, and in Appendix 6 in the DEIS, as well as in the **Areas of Critical Environmental Concern** section in Chapter 2 and Appendix 10 of this Plan. ACEC nominations were considered by an evaluation team to determine if they met the relevance and importance criteria described in 43 CFR 1610.7.2. After careful evaluation, it was determined that the resources identified in the nominations would be adequately protected by the management prescriptions proposed in the alternatives. Therefore, it was determined that no ACECs would be proposed through this planning process.

An ACEC designation does not in itself provide protection. The protection comes from management prescriptions that the BLM proposes through the planning process. Those protective prescriptions can be made without an ACEC designation. Examples of proposed management prescriptions that protect the resources that the Monument was set aside to preserve include: closing the Monument to cross-country vehicle use, limiting or not allowing the placement of minor facilities (such as pullouts, parking

areas, signs, etc.), limiting group size, and limiting or not allowing rights-of-ways. A complete discussion can be found in Chapter 2 of this Plan. The proposed management prescriptions are similar to those "special management prescriptions" that could be proposed for an ACEC, and they are the prescriptions the BLM considers necessary to protect resources within the Monument.

Although mistakenly not included on the list of nominations on page A6.2 of the DEIS, the Scenic Routes ACEC nomination is shown in Table A6.1 on the next page. This nomination was evaluated for relevance and importance, along with the other nominations. It was determined that the management prescriptions provided for the zones adequately protect the scenic corridors and that an ACEC designation was not warranted.

As stated on page 2.83 in the DEIS, "All existing special designations (ONAs, RNA, WPFA) are consistent with the Proclamation and the objectives of the alternatives of the Plan. Thus, these designation would be continued in all alternatives." These special designations are discussed in Appendix 18 in the DEIS, and ACEC status is not necessary to provide further protection.

GEN-27

COMMENT: The cumulative impacts are not quantifiably distinguished between the alternatives.

RESPONSE: The Cumulative Impacts section (Chapter 4) in the DEIS discusses the cumulative impacts of the five alternatives. Although Alternatives B, C, D and E are not discussed separately, impacts that are different between the alternatives are discussed qualitatively in the narrative. This Cumulative Impacts section is organized in the same manner as the rest of Chapter 4, in order to facilitate comparison with the other impact discussions. Quantitative analysis for cumulative impacts was not always possible due to the absence of quantitative data upon which to base the analysis. The level of detail included in this section is comparable to that included in the rest of Chapter 4 and to the specificity of the decisions being proposed. The **Cumulative Impacts** section of this Proposed Plan includes a discussion of cumulative impacts of the proposed decisions which is quantified when possible.

GEN-28

COMMENT: In the analysis there are a number of surface disturbing activities such as grazing, resource exploration and extraction, vegetation manipulation, research and illegal use of ATVs that were not included in the assumptions for acres of disturbance. Why?

RESPONSE: Grazing, resource exploration and extraction, vegetation manipulation, and surface disturbing research were not included in the acres of disturbance estimates because there are no specific proposals for these

activities in the DEIS. These topics are discussed in the Management Common to All Alternatives section of the DEIS since management does not vary by alternative. Since a more detailed discussion of circumstances where vegetation restoration would be used is provided in this Plan, estimates for acres of disturbance from vegetation restoration have been included for analysis purposes in Chapter 3. These estimates would have been roughly the same across the alternatives in the DEIS since management ignited fires would be the predominate tool used and this tool was allowed in all alternatives.

Illegal use of ATVs has the same impacts as allowing cross-country travel. It is assumed that illegal ATV use levels would not differ significantly by alternative, so speculating would not assist with comparisons among alternatives.

GEN-29

COMMENT: The Summary of Environmental Consequences Table (pages S.24 and 4.70) is incorrect when it says "animal damage control activities would directly and indirectly impact visitor experiences in Alternative D."

RESPONSE: The tables are incorrect and have been changed to "visitor experience would not be impacted by animal damage control activities, because these activities would not be allowed." The text in Chapter

4, page 4.40, is correct. Corrections have been made on the Errata at the end of this document.

GEN-30

COMMENT: The DEIS did not seem to address mitigation or limits on surface-disturbing research. Will surface disturbing research be allowed, and if so under what conditions? What is the definition of "high-scientific value?" What will the permit policy be for surface-disturbing or non-surface disturbing research?

RESPONSE: The section in Chapter 2 on **Management of Science and Research Activities** discusses the management of research activities in the Monument. All science and educational related activities would require special-use permits, and in general, researchers would need to comply with the zone prescriptions (group size, mechanized vs. non-mechanized, etc.). The BLM would consider exceptions to the zone prescriptions during the special-use permitting process for extremely high-value research opportunities, where opportunities are not available elsewhere or where research projects focus on protecting resources at risk.

Because future science activities cannot be envisioned now, surface-disturbing research projects would be considered on a case-by-case basis by the BLM during the permitting process. This would be done in consultation with the GSENM Advisory Committee,

which includes eight members from the scientific community. The research value of the project and its mitigation potential would be weighed against the project's impact(s) to other Monument resources. Surface-disturbing research activities would be addressed and mitigated where necessary in the special-use permit. Some projects, due to their scope and location, may require NEPA analysis.

Projects with high-scientific value are those which have the potential to significantly enhance the knowledge base and protection of Monument resources. In general, these are projects that can help evaluate/stabilize certain resources at risk (e.g., threatened and endangered species, riparian zones, geologic hazards). Projects with high scientific value also refers to those research projects that are unique to the Monument and could not be done elsewhere.

Some people commented that surface-disturbing research for paleontological or archaeological studies would destroy Monument resources in violation of the Antiquities Act. Artifacts found during such studies would be collected to standards established by the GSENM Advisory Committee, and the artifacts would be properly curated.

GEN-31

COMMENT: Explain how the science program would protect Monument resources. How can science occur without affecting Monument resources?

RESPONSE: The Monument provides an unparalleled opportunity for the study of large-scale scientific and historic resources. In addition to the study of specific scientific resources, this setting allows study of such important issues as: understanding ecological change over time; increasing our understanding of the interactions between humans and their environment; improving land management practices; and achieving a properly functioning, healthy, and biologically diverse landscape. Science would be supported and encouraged, but intrusive or destructive investigations would be carefully reviewed to avoid conflicts with the BLM's responsibility to protect and preserve scientific and historic Monument resources.

Science can aid the BLM in protecting Monument resources. By conducting research in the Monument, the best possible information would be made available to be used to protect resources. For example, conducting baseline inventories for hanging gardens, sensitive areas and areas that may be potentially affected from proposed activities can be identified. This would allow for appropriate measures for the protection of these resources. All science activities and

programs would have measurable objectives and would be evaluated as described in the **Implementation and Adaptive Management Framework Appendix** of this Plan. Chapter 2 of this document also discusses the idea of leaving some resources in place for their protection and possible future study. Although science is an integral part of the Monument, protection of Monument resources is the primary concern in the management of the Monument.

GEN-32

COMMENT: How were the assumptions for disturbance generated and why did Alternative D project more disturbance than other alternatives?

RESPONSE: Each alternative presented in Chapter 2 of the DEIS includes a discussion of the guiding philosophy for that alternative. The assumptions on surface disturbance were based on these philosophies and any reasonable foreseeable actions stemming from them. Alternative D has a philosophy that discouraged intensive use in the interior of the Monument, although self-directed experiences (primitive camping experiences) would be encouraged. As a result, it was reasonably foreseeable that more primitive camping areas would be designated in that alternative for resource protection purposes. For example, if dispersed camping were creating widespread disturbance in a sensitive area, specific areas could be designated and the rest of the area closed to camping. While

this may create some surface disturbance at the designated site, more widespread disturbance would be avoided.

The estimated acres of disturbance for the primitive camping areas is based on the average size of disturbance of existing primitive camping areas in the Monument. These primitive camping areas (as they were referred to in the DEIS) are more than single sites, but are "areas" where several primitive sites could be located. The assumptions for disturbance for this Plan are included at the beginning of Chapter 3.

GEN-33

COMMENT: The DEIS and Proposed Plan should include the cumulative effects of displacing visitors onto lands managed by adjacent agencies. Adjacent agencies report increased use from Monument designation. The impacts of adjacent land management practices on resources in the Monument should also be analyzed.

RESPONSE: Due to the limited amount of current and projected use in the Monument (discussed in Economic Conditions, Appendix 19 in the DEIS), displaced use of activities restricted in this Plan (e.g., OHV use) is expected to be low on adjacent agency lands. In order to provide clarity, this Plan has been expanded to provide an analysis of the impacts of proposed actions to local, state and Federal land neighbors including the potential to displace use.

A general discussion of impacts of adjacent land management practices on Monument lands was included in the Cumulative Impacts section in Chapter 4 of the DEIS. In this Plan, the **Cumulative Impacts** sections in Chapter 3 includes a discussion of impacts from adjacent agencies land management practices on resources within the Monument.

GEN-34

COMMENT: The economic analysis should include impacts associated with the creation of the Monument.

RESPONSE: The purpose of the Environmental Consequences section of the DEIS, including the economic analysis discussion, is to provide a basis for the BLM and the public to compare various options for managing the Monument. The creation of the Monument itself is outside the scope of this Plan.

GEN-35

COMMENT: Current data on how many people visit or go to the Monument and what uses are occurring on Monument lands should be provided.

RESPONSE: Chapter 3 of the DEIS included sections on Visitor Use (page 3.48) and Land Use Permits and Classifications (page 3.51). These sections provide the reader with visitation numbers from 1980 through 1997, the number and type of outfitter operations,

and a list of existing visitor facilities. The Land Use section of the same chapter reviews existing rights-of-way, withdrawals, mineral, coal and oil and gas leases, grazing allotments, and transportation system information.

These sections are not repeated in this document. However, the background information in Chapter 3 of the DEIS was used in the analysis conducted in this Plan/FEIS.

GEN-36

COMMENT: There is no indication that the BLM has made any attempt to coordinate proposed land use practices with the surrounding lands. The DEIS is inconsistent with and did not consider numerous Federal, state, and local plans.

RESPONSE: The DEIS included a section on Planning Consistency (page 5.2). That section noted that 10 municipal plans, 2 county plans, 2 regional plans, 16 Utah State agency plans, and 8 Federal agency plans were reviewed, and that no major inconsistencies were identified. Six comments on the DEIS noted concerns regarding consistency with specific plans. Responses to those concerns are found in Chapter 4 of this Plan. This Plan also endorses consistency with Federal, state, and local plans. See the **Planning Consistency** section in Chapter 4 of this Plan.

GEN-37

COMMENT: It is unclear how the protest and appeal process will work if the Secretary of the Interior signs the Approved Plan/Record of Decision. Having the Secretary sign the Plan circumvents the appeal process.

RESPONSE: The protest and appeals process will work exactly the same as they would if an officer of the BLM were signing the Approved Plan/Record of Decision.

The protest procedures prescribed in 43 CFR 1610.5-2 provide the public with an opportunity to initiate administrative review of perceived oversights or inadequacies in a proposed plan. These procedures are described at the beginning of this Plan. Any person who participated in the planning process and has an interest which is or may be adversely affected by the approval of the Plan may protest. A protest may raise only those issues which are submitted for the record during the planning process.

An appeal (43 CFR Part 4) is an opportunity, provided by the Secretary of the Interior, for a qualified individual to obtain a formal quasi legal review. The review is performed by an independent board who analyzes the procedures followed by an Interior Agency in making a decision. While many decisions may be appealed, planning decisions made under 43 CFR 1600 may not be appealed. Thus, while land use planning decisions can

be protested, they cannot be appealed, regardless of who signs the Approved Plan/Record of Decision.

GEN-38

COMMENT: The issue of cumulative impacts on communities and community needs has been inadequately addressed in the DEIS. A community support alternative should have been considered.

RESPONSE: Cumulative impacts to the Monument and to communities are analyzed in the DEIS in Chapter 4, beginning on page 4.47. Impacts on local economies and cumulative impacts are also presented with respect to alternatives in Chapter 4, Table 4.1, on page 4.73 of the DEIS. Chapter 3 of this Plan includes similar analysis of impacts on communities and local economies.

Many of the scoping participants urged the BLM to support local communities through such measures as placement of facilities, funding for infrastructure, providing planning assistance and loans, hiring local people, preventing franchise and chain businesses in local communities, and using local preferences in providing services such as guides and outfitters. They also encouraged the BLM to enter into partnerships with local governments for support of search and rescue and other functions. Comments from the public on the DEIS were similar, and some encouraged the BLM to examine a "Community Support" alternative. The BLM

can and does participate in many of these types of activities such as providing assistance to communities for planning, and for search and rescue. However, some of the suggested activities, such as preventing franchise businesses in local communities, are beyond the BLM's authority. The BLM is committed to supporting and cooperating with the gateway communities regardless of the alternative selected. Therefore, a separate Community Support alternative was not analyzed.

GEN-39

COMMENT: The range of alternatives for the DEIS was too narrow and did not cover the full range of possible alternatives.

RESPONSE: Page 2.1 in the DEIS describes the approach used for determining the range of alternatives.

"Alternatives B, C, D, and E describe various ways the provisions of the Proclamation would be applied to direct management of the Monument. Each alternative has a somewhat different emphasis, primarily defined in terms of resource focus, but all afford the high degree of protection of Monument resources required by the Proclamation. As a result, the range of alternatives presented in this Plan is narrower than in standard Bureau of Land Management plans. The DEIS does represent a full range of the alternatives possible within the parameters of the Proclamation."

GEN-40

COMMENT: The following are comments concerning the economic analysis for the DEIS.

A. The DEIS analysis contains unsubstantiated assumptions that bias the economic analysis in favor of the Preferred Alternative and against Alternative D. The impacts seem inconsistent with the data.

B. There is no explanation on page S.27 for how the impact on local communities changes from one alternative to the next. Clarification is needed on growth expenditures and revenues.

C. Southern Utah and northern Arizona should be included in the economic analysis.

D. The DEIS misrepresents the economic significance of "amenity." Amenities are not merely tourist attractions.

E. The economic analysis deserves independent review by a number of economists who work with public land issues.

F. The economic impact of reconstructing existing powerlines to meet non-electrocution standards is not addressed.

G. The "visitor activity categories" selected for economic analysis are biased in favor of motorized recreation.

H. The estimated growth rates for "visitor activity category" bias the economic analysis in favor of motorized use.

I. The DEIS and Utah Governor's Office of Planning and Budget (GOPB) report are based on a number of assumptions that appear to bias the assessment against non-motorized use and against the selection of Alternative D.

J. The economic analysis fails to account for economic benefits that occur distant from the immediate vicinity of the Monument.

K. The economic analysis in the DEIS contains a number of erroneous or misleading statements that should be corrected.

L. The DEIS is in need of a sensitivity analysis of the assumptions used in the economic analysis.

RESPONSES:

A. The BLM provided the assumptions used in the economic analysis. The management focus of each alternative was used to generate a matrix of assumptions for 16 management activities ranging from OHV use to regulating filming. The base budget and personnel available to accomplish Monument management activities remained constant over all alternatives, and does not change for the analysis of this Proposed Plan. Because the management focus of Alternative D was to "maximize protection of the natural environment, while enhancing its remote

character by limiting travel corridors and visitation" (DEIS, page 2.39), it was assumed that group size limitation, miles of routes and trails, and extensive allocation of visitors inside the Remote and Rustic Zones would constrain the amount of visitation to the Monument to levels below baseline visitation growth. Under Alternative D, the Monument would be aggressively managed to accommodate 1997 visitation levels, except scenic driving, which was assumed to increase due to additional motorized use in the Enhanced Zone. The other alternatives analyzed anticipated management activities that would accommodate higher visitation to a greater extent across the Monument.

B. A more thorough explanation of the summary information on page S.27 regarding impact to local economies is included in Appendix 19 of the DEIS, which reviews an analysis completed by the GOPB. The GOPB assisted in the review of comments regarding the analysis, and revised the applicable input-output and fiscal impact models based upon additional data and assumptions from this Proposed Plan. The impacts of this Plan are driven by BLM spending and employment, and spending by visitors. The direct, indirect and induced effects of this spending and employment on population, employment, employee earnings, and local government revenues in the Southwest region are the focus of the analysis. The steady operating budget, constant employee base, and fixed facility

locations resulted in little variation between alternatives and over time.

C. The five counties that comprise southwestern Utah were selected as the appropriate region for analysis because: (1) the five counties already form a multi-county Planning District of the State of Utah; (2) significant amounts of data have been collected and analyzed at the southwestern Utah regional scale; and (3) the southwestern Utah region has a closed labor market in the sense that 90 percent of the income generated in the region is also received there (GOPB, 1998). The northern Arizona communities of Page, Fredonia and Colorado City were considered for inclusion in the analysis because they also influence economic activity in the region. However, the extent of the effects were considered too small to have a significant impact on the analysis.

D. The models used to generate the socioeconomic impacts identified in the DEIS contain baseline migration assumptions and formulas that address the factors that influence why a county or community is experiencing population growth or decline. These factors do not rely solely upon tourism impacts, but also account for migration due to other "amenity" variables.

E. The BLM and GOPB recognized the need for an independent professional review of the socioeconomic analysis and established a Technical Review Committee consisting of six independent economists. This committee

met on three occasions. The committee was also provided information during the preparation of the analysis through electronic mail. The basic components of the models, the assumptions, and the findings of the analysis were reviewed and accepted by the committee prior to the release of the analysis to the BLM. These economists were: Walter Hecox, from Colorado College; Frank Hachman, from the University of Utah; Lecia Langston, from the Utah Department of Workforce Services; Ray Rasker, from the Sonoran Institute; Don Snyder, from Utah State University; and Gil Miller, from Economic Associates of Utah.

F. It is not the intent of Monument managers to require immediate compliance to the raptor protection standards upon adoption of the Approved Plan. As powerlines are upgraded or a raptor problem is documented, compliance with the standards would be expected. Therefore, the line upgrades would be part of ongoing maintenance activities, which already factor raptor protection into construction costs.

G. The visitor activity categories are not biased in favor of motorized recreation; they simply reflect current information categories of use within the Monument. The visitor activity categories were selected by the Monument Planning Team and economic analysts from visitor count data provided by BLM field staff. These counts were based on: (1) the number of people who signed registers; (2) back country permit

information; (3) on-site counts conducted by BLM personnel; (4) traffic counters; and (5) personal observations by BLM officials at selected locations. BLM staff recorded the activities that visitors participated in, as well as an average amount of time spent pursuing the activity. In 1997, Oregon State University conducted an informal survey of visitors. This survey assisted in better estimating visitor activities. The categories selected for analysis were based upon the visitor count data and informal survey. Motorized use of 35,000 visitor days in 1997 was included in the "other" category, but not listed in the text of the analysis. This omission has been corrected in this Plan.

H. Because the management focus of Alternative D was to "maximize protection of the natural environment, while enhancing its remote character by limiting travel corridors and visitation" (DEIS, page 2.39), the BLM assumed that group size limitation, miles of routes and trails, and extensive allocation of visitors inside the Remote and Rustic Zones would constrain the amount of visitation to the Monument to levels below baseline visitation growth. Under Alternative D, the Monument would be aggressively managed to accommodate 1997 visitation levels, except for scenic driving, which was assumed to increase due to additional motorized use in the Enhanced Zone. The other alternatives analyzed anticipated management activities which would accommodate higher visitation to a greater extent across the Monument. Eight other National recreation destinations

were selected and visitor counts for those areas were analyzed, along with a matrix of management assumptions provided by the BLM, to provide a basis for establishing the Annual Average Rate of Change for the DEIS alternatives.

I. The development of the assumptions are discussed above in G and H. While the assumptions were an important part of the socioeconomic analysis, the results of the analysis were not the sole factor for selection of a preferred alternative or this Plan. The selection of management zones, the transportation network, and other major components of this Plan were based upon the provisions of the Proclamation, FLPMA, the analysis of environmental consequences, and public comment.

J. The intent of the GOPB analysis was to create a comprehensive review of social and economic baseline and trend data for the area surrounding the Monument to support the effects analysis in the DEIS and this Plan. The geographic extent of the analysis includes the area where economic effects could be reasonably assessed with enough confidence to adequately support subsequent decision making. Such analysis becomes overly speculative with greater distance.

An analysis of general benefits and costs that accrue to Americans outside the region from management of public lands is beyond the scope of this Plan, and is addressed in BLM and other Department of the Interior strategic

planning documents. The non-market benefits and costs of Monument management are discussed in the **Cumulative Impacts** section in Chapter 3 of this document.

K. The suggested corrections have been incorporated, where applicable, into the new socioeconomic evaluation in this Plan.

L. The application of a sensitivity analysis to consider changes in economic impacts would not affect the development of this Plan. The alternatives were not ranked by the results of the assumptions matrix. Systematically varying visitor activity categories and growth rates would not result in significant changes in results, since the impacts of all of the management alternatives on local government revenues and expenditures are relatively small.

GEN-41

COMMENT: Why was data/information from the preliminary Draft Environmental Impact Statement for Warm Springs not used?

RESPONSE: Many sources of information were utilized in the preparation of the DEIS, as noted by the reference section. The Warm Springs document was a preliminary draft, and had not been released for public review when the DEIS was completed, and thus was not referenced in that document. However, since the preliminary Warm Springs document covered some area in the

Monument, many of the relevant data sets such as paleontology, archaeology, and soils used to develop the Warm Springs document were also used in the development of this Plan.

GEN-42

COMMENT: Some communities have a concern about having a primitive zone adjacent to their communities.

RESPONSE: The zone boundaries for this Proposed Plan have been changed from those that appeared in the DEIS Preferred Alternative. These zones are based on use, sensitive resources, topography, and other criteria as described in the **Zone Descriptions** section in Chapter 2 of this Plan. These criteria resulted in zones other than primitive in the immediate vicinity of most communities due to topography, use patterns, and other factors. However, the Primitive Zone is still adjacent to some parts of the town of Boulder because the nature of much of the landscape (fractured terrain and remoteness) does not lend itself to more developed zones. In any case, the Primitive Zone only overlays lands within the Monument boundary. The management prescriptions for the Primitive Zone end at the Monument boundary. Lands owned by communities, other land management agencies, or private individuals are not subject to the management prescriptions for the Primitive Zone.

GEN-43

COMMENT: What is the relationship between the Proclamation and FLPMA? The principle direction for management of the Monument should be FLPMA, not the Proclamation. Multiple use should be emphasized.

RESPONSE: FLPMA is still the source for the BLM's authority to manage GSENM. The Proclamation governs how the provisions of FLPMA would be applied and how competing uses would be weighed when applying FLPMA's multiple use mandate. For example, the Proclamation withdrew the entire Monument from mineral entry and decreed that the over-riding purpose of the Monument was to "set apart and reserve" the Monument "for the purpose of protecting the objects identified." The Proclamation, FLPMA, and other laws governing management of the Monument were discussed throughout Chapter 1 of the DEIS and again in Chapter 1 of this Plan. A discussion of multiple use and its relationship to the Monument was included in both.

GEN-44

COMMENT: Why is the No Action Alternative more restrictive than the Interim Management Guidance for the Monument?

RESPONSE: The provisions in the No Action Alternative are not more restrictive than this Guidance. Chapter 2, page 2.1, of

the DEIS states, "The No Action Alternative describes the continuation of the current management of the Monument, in which the provisions of the Proclamation and the Interim Guidance issued by the Director of the BLM are applied as proposals are received, and to needs as they occur."

The Interim Guidance did not cover all actions or management decisions necessary to operate and manage the Monument. For actions or issues that were not covered under Interim Guidance, managers had to make decisions and seek further guidance about how to manage the Monument under existing law and the Proclamation. These decisions are reflected in the No Action Alternative.

GEN-45

COMMENT: VERs should include traditional uses, such as grazing.

RESPONSE: This Plan does address uses such as grazing, but does not characterize all uses as "valid existing rights." As described in the **Valid Existing Rights and Other Existing Authorizations** section in Chapter 2 of this Plan, VERs are those "rights" in existence within the boundaries of the Monument before the Monument was established. VERs were established by various laws, leases, and filings through local, state, and Federal processes. To a large degree, VERs pertain to mining and minerals activities. There are, however, other situations unrelated to minerals (such as

rights-of-way) in which the BLM has authorized some use of public land, or has conveyed some limited interest in public land. These authorizations, where they are valid and existed when the Monument was established, would be recognized and their uses would be allowed to continue, subject to the terms and conditions of the authorizing document. By contrast, certain other uses (such as livestock grazing) are authorized under permits which convey no right, title, or interest in the land or resources used. While the Proclamation specifically mentions livestock grazing, the Proclamation does not establish livestock grazing as a "right" or convey it any new status. Livestock grazing would therefore "continue to be governed by applicable laws and regulations other than [the] Proclamation."

GEN-46

COMMENT: The planning criteria were never available for public comment.

RESPONSE: The Guiding Principles were the first step in defining the Planning Criteria. In Planning Update Letter No. 2 (July 9, 1997), the Guiding Principles were outlined and the BLM asked for public comment on those Principles.

The Principles were further refined and sent out for another public review in Planning Update Letter No. 3 "Preliminary Planning Criteria - Scope of the Plan," in August 1997.

As stated in Planning Update Letter No. 4 (November 1997), "Our last mailing included a preliminary list of planning criteria. This list is being modified to reflect comments received during the scoping process."

Planning Update Letter No. 5 (January 1998) stated, "The Planning Team began the development of planning criteria early in the process, with the publication of Preliminary Planning Criteria on August 14, 1997. Additionally, a set of Guiding Principles was published in our July 9, 1997 Update. In keeping with the direction of 43 CFR 1610.4-2, we are now publishing the latest set of Planning Criteria, which combines the Preliminary Criteria and Guiding Principles, revised to reflect comments received. These criteria may be added to as we continue drafting the Plan."

These Update Letters were sent to over 3,500 individuals, organizations, Federal, state and local governments on our mailing list at the time. The initial mailing list was comprised of known individuals, organizations, and government agencies (local, state, Federal) who had an interest in this area. As the planning process progressed, additional names were added to this list through participation in meetings, response to publications, and other outreach efforts. The Updates were also posted on our website. We received many comments on the guiding principles and planning criteria that assisted us in finalizing the planning criteria.

GEN-47

COMMENT: The Plan is too general to draw any adequate conclusions.

RESPONSE: The scope of the DEIS and Proposed Plan is necessarily broad, since it is a general framework document that would guide the overall management of activities within the Monument, as well as the use and protection of Monument resources. Subsequent landscape-level analyses and site-specific planning (called project plans) would be tiered from this Plan. Project-level plans would address specific resource issues in specific geographic areas. Detailed environmental analysis would be completed at the time these site-specific plans were developed.

GEN-48

COMMENT: The Proposed Plan should consider the impacts on VERs and governmental functions (search and rescue, waste disposal, law enforcement, etc.).

RESPONSE: As discussed in the **Valid Existing Rights and Other Existing Authorizations** section in Chapter 2 of this Plan, claims for VERs would be evaluated, and honored when determined valid. Under BLM regulations, private land owners have the right to reasonable access to their land, and this would not change under management of the Monument. Decisions on route closures in the Proposed Plan were based on

several criteria (**Transportation and Access** section in Chapter 2), one of which was access to private lands. Therefore, VERs would not be affected by actions proposed in this Plan. RS 2477 assertions are discussed in the **Transportation and Access** section in Chapter 2 and in ACC-10.

The BLM has provided temporary monetary support for search and rescue and other issues related to the Monument in both Kane and Garfield Counties. Long term cooperative efforts are being discussed, but would at least be equivalent to the types of cooperation provided by other public land areas in the western United States. Solid waste disposal contracts with the Counties have also been negotiated and will continue. Support activities will continue to be coordinated with the Counties and adjacent land management agencies to facilitate communication and shared resource use into the future.

GEN-49

COMMENT: Why was a "Conservation Biology" alternative not analyzed?

RESPONSE: The DEIS included a discussion of Alternatives Considered but Eliminated from Detailed Analysis. One of these alternatives, on page 2.100 in Chapter 2 of the DEIS, was a "Natural Ecosystem" alternative. As stated, "All of the alternatives analyzed provide protection to natural ecosystems, so a separate Natural Ecosystem Protection Alternative is not analyzed in

detail." Though not specifically called a "Conservation Biology" alternative, the philosophy is similar and the goals of protecting habitat, looking at long-term ecosystem viability, and preventing ecological degradation are the same.

These goals are shared by the BLM, and are part of all alternatives proposed for Monument management. The Proposed Plan includes objectives for biological resources, including wildlife, vegetation, and special status species among others. The issues raised in the goals listed above are covered by these objectives. For this reason, a separate conservation biology alternative is not warranted.

GEN-50

COMMENT: No clear definition of Monument purposes, resources, and values has been developed.

RESPONSE: In Chapter 1, page 1.1 of the DEIS, the Introduction states, "The Monument was created to protect a spectacular array of scientific, historic, biological, geological, paleontological, and archaeological objects. These treasures, individually and collectively, in the context of the natural environment that supports and protects them, are the 'Monument resources' discussed throughout this Plan. The terms 'Monument values' and 'Monument objects' have also been used, but because the term 'Monument resources' may be more easily

understood, it will be used throughout this document."

GEN-51

COMMENT: Why was spatial analysis and modeling (including connectivity modeling) not done for the Plan?

RESPONSE: Spatial analysis was taken into consideration in the development of the zones and policies in the DEIS and Proposed Plan and the connectivity with adjacent agencies was considered in delineating zone boundaries. Further spatial analysis of impacts on Monument resources, including wildlife, has been completed for the DEIS and are provided in the answers to ACC-13, ACC-14, and BIO-16.

Many resources have the potential for modeling but they require time to develop and do not always result in reliable information. Limited time was available for development of models and evaluation of their usefulness. While the BLM did not do specific resource modeling, discussions with biologists and experts who have worked in this area for years have provided detailed information throughout plan development. This information has been used in the development of zones and the strategies for protection of Monument resources. Additionally, studies have been initiated for modeling vegetation and other resources in the Monument. These studies will provide data that addresses resources specific to the

Monument and will aid future management in the protection of these sensitive resources through the **Implementation and Adaptive Management Framework** discussed in Appendix 3 of this Plan.

GRAZ-1

COMMENT: Phase out livestock grazing in the Monument, or no livestock grazing should occur within the Monument.

RESPONSE: The Presidential Proclamation which established the Monument states, "Nothing in this Proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the monument: existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation." Therefore, this Plan does not address grazing, permits, leases, or levels of livestock grazing. Livestock grazing would continue to be managed under existing laws and regulations. The **Livestock Grazing** section in Chapter 2 of this Plan has a discussion of how grazing permit renewals and allotment management planning would be handled under existing laws and regulations.

GRAZ-2

COMMENT: None of the alternatives in the DEIS restrict livestock grazing.

RESPONSE: The Presidential Proclamation which established the Monument states,

"Nothing in this Proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the monument: existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation." Therefore, livestock grazing shall continue to be managed under existing laws and regulations.

GRAZ-3

COMMENT: Grazing should be regulated under Federal laws; livestock grazing is not in compliance with the Proclamation or Endangered Species Act.

RESPONSE: Livestock grazing within GSENM is being managed pursuant to a substantial body of Federal laws and regulations, such as the Taylor Grazing Act, FLPMA, and the Endangered Species Act. In addition, the Utah State Director for the BLM has developed Standards for Rangeland Health and Guidelines for Grazing Management, which were approved by the Secretary of the Interior in 1997. The Utah Standards and Guidelines apply to grazing management statewide and address habitat for special status species, among other issues. The authorized officer (Monument Manager) shall determine rangeland health for each grazing allotment in the Monument according to these Standards and Guidelines. Where allotment assessments determine that rangeland health is not being achieved, and livestock grazing is determined to be the

cause, the authorized officer shall take appropriate action under any applicable legal authorities (including the Taylor Grazing Act, FLPMA, the Public Rangelands Improvement Act, and 43 CFR Subparts 4120, 4130, and 4160). It is under this process that grazing is, and will continue to be, managed to meet the requirements of the Endangered Species Act and other laws and regulations. A discussion of the management of special status species in the Monument, and management actions proposed under this Plan (including surveys) for such species is described in the **Special Status Animal Species** and **Special Status Plant Species** sections in Chapter 2 of this Plan.

GRAZ-4

COMMENT: Has the BLM considered buying Animal Unit Months (AUMs)? What happens to allotments that are not being grazed?

RESPONSE: Grazing permittees pay the BLM a grazing fee for the privilege of grazing their livestock on public land. These fees are based on the amount of livestock grazed, and the length of time the livestock is grazed on public lands (Animal Unit Months, or AUMs). The BLM does not attach monetary value to these grazing permits. Thus, there is nothing for the BLM to "buy" from grazing permittees.

Should an allotment or a portion of an allotment become available through a

voluntary relinquishment or an operation of law, it could be considered for grass banking. Grass banking refers to the setting aside of lands for future grazing use to offset potential future reductions in existing allotments or to facilitate research in grazing methods. The BLM is not obligated to graze the grass bank allotment annually, and use of the grass bank by qualified applicants, permittees, or lessees is within the discretion of the BLM.

GRAZ-5

COMMENT: How is livestock grazing handled in the Plan and in the future? Why wasn't grazing management treated differently between the alternatives? Why is the BLM waiting three years after this plan to address grazing or to remedy any problems? How is grazing on State lands within the Monument handled?

RESPONSE: The Proclamation stated that "Nothing in this Proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing . . . existing grazing uses shall continue to be governed by applicable laws and regulations . . ." Thus, livestock grazing in the Monument would be managed in keeping with applicable laws and regulations, and with the BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing (Appendix 5). The **Livestock Grazing** section in Chapter 2 of this Plan describes, in detail, how grazing uses within the Monument shall be managed. This Plan describes a process for grazing

management that provides a single schedule for completion of subsequent NEPA analysis Monument-wide. Alternative ways of managing grazing were not presented in the DEIS, because like other issues (e.g., Wilderness Study Areas) in the Management Common To All Alternatives section of the DEIS, existing laws govern how they would be managed.

The schedule for completion of the assessments and Allotment Management Plans described in Chapter 2 states that they would be completed over a three year time frame. This does not mean that actions (including assessments and activity planning) will not occur for three years. Instead, it means that these grazing management actions will occur on allotments based on the priority basis listed in the **Livestock Grazing** section in Chapter 2 of this Plan. Efforts are currently underway to assess allotments. As stated in the **Livestock Grazing** section, at any time an authorized officer (of the BLM) determines that an area is not achieving the Utah Standards for Rangeland Health, the officer shall determine whether or not existing livestock grazing practices or levels of use are significant factors in the inconsistency and shall take appropriate action under applicable authorities as soon as possible.

The State lands within the Monument were acquired by the Federal government under the Utah Schools and Land Exchange Act (see Chapter 1 for further discussion). Thus, there

are no longer state-owned lands within the Monument. Grazing on these former State-owned parcels will be managed subject to the terms and conditions of existing State grazing permits as discussed in the **School and Institutional Trust Lands Administration Lands Acquired** section of Chapter 2.

GRAZ-6

COMMENT: Why was there no grazing allotment map in the DEIS?

RESPONSE: A grazing allotment map was not included in the DEIS because the information was not considered necessary for evaluation of the alternatives presented. A list of allotments and associated information was included in Appendix 22 in the DEIS. This appendix provided the relevant background information necessary to assess the current situation, the management of grazing under existing laws and regulations, and the Environmental Consequences described in Chapter 4. In response to public requests, a grazing allotment map is provided along with a list of allotments in Appendix 6 of this Plan.

GRAZ-7

COMMENT: Impacts on livestock operators and restrictions on access and water developments were not analyzed.

RESPONSE: As stated in the Livestock Grazing section in the DEIS, livestock

grazing is governed by laws and regulations other than the Proclamation. For this reason, discussion of livestock grazing was included in the Management Common to All Alternatives section of the DEIS. Likewise, discussion of impacts across alternatives was general, but did include analysis of access and water developments. Page 2.82 of the DEIS describes special access for livestock permittees, among others. Access for the maintenance of livestock range facilities is allowed, as provided in permits issued for allotments. Therefore, access restrictions would not affect a permittees's ability to access developments.

Installation and maintenance of water developments is discussed in each of the alternatives of the DEIS. Protection of Monument resources is a primary concern in management of this area. Maintenance of existing water developments is allowed in the alternatives. New water developments, though limited in the various alternatives, may be used for better distribution of livestock when beneficial to Monument resources as discussed in the **Water-Related Developments** section in Chapter 2 of this Plan. Proper management of grazing allotments is imperative for the protection of these resources. If it was determined that water developments are needed to prevent degradation of Monument resources, they may be allowed in any of the alternatives. Therefore, restrictions on water developments would not cause significant impacts to livestock operators. A discussion of impacts

to livestock operators is provided in the Environmental Consequences section of the DEIS and also in Chapter 3 of this Plan.

GRAZ-8

COMMENT: The Taylor Grazing Act does not apply to management of the Monument.

RESPONSE: Section 315 of the Taylor Grazing Act discusses establishment of grazing districts. It states that "...the Secretary of the Interior is authorized...to establish grazing districts...from any part of the public domain...which are not in...national monuments..." The area encompassing GSENM was included in a grazing district prior to establishment of the Monument, so the Taylor Grazing Act does apply.

LAND-1

COMMENT: Explain the utility and water rights-of-way (ROW) policy in the Monument. Communication sites and ROWs should be limited or prohibited. The need for new utility ROWs should be recognized and planned for.

RESPONSE: Title 5 of FLPMA allows for the authorization of new ROWs (including communication facilities) on public lands. Nothing in the Proclamation precludes this from occurring, so long as Monument resources are protected. Approval of new ROWs in the Monument would be determined on a case-by-case basis.

Proposals for new ROWs would be reviewed for conformance with zone criteria in the Approved Plan. Where zone criteria do not prohibit new ROWs, these uses could be approved through NEPA analysis (see the **Rights-of-Way** section in Chapter 2 of this Plan for a description of the ROW policy in the various zones).

Utility lines and communication facilities are authorized under ROW grants which include a variety of terms, conditions, and stipulations. These terms, conditions, and stipulations regulate the construction, operation, and maintenance activities of the authorized ROWs and are developed when site-specific environmental analysis occurs.

LAND-2

COMMENT: Explain the land acquisition policy in the Monument.

RESPONSE: As stated in the **Non-Federal Land Inholdings** section in Chapter 2 of this Plan, the BLM would consider land exchanges and acquisitions as long as the current owner is a willing participant and as long as the action is in the public interest, and is in accordance with other management goals and objectives of this Plan. The action must also result in a net gain of objects and values within the Monument, such as wildlife habitat, cultural sites, riparian areas, live water, threatened and endangered species habitat, or areas key to the maintenance of

productive ecosystems. The action may also meet one or more of the following criteria:

- ensures the accessibility of public lands in areas where access is needed and cannot otherwise be obtained
- is essential to allow effective management of public lands
- results in the acquisition of lands which serve a national priority as identified in national policy directives

All land exchanges and acquisitions would be subject to valid existing rights as determined by the BLM.

LAND-3

COMMENT: Did the BLM analyze utility corridors? Why wasn't the Western Utility Corridor Study considered?

RESPONSE: The Western Regional Corridor Study (completed in 1992) was taken into consideration in the development of the DEIS and this Plan. It is important to note that the study is not a decision document, rather it is a document which the BLM committed to use as reference when considering land use decisions. The study identified two recommended corridors within the Monument: Cottonwood Canyon Corridor and the Navajo-McCullough Corridor. These "corridors" are routes with existing utility lines, but they have not been officially designated by the BLM. The study recommending these two corridors was

completed before Monument designation. Given the purposes outlined in the Proclamation (to protect scientific and historic objects), designating utility corridors in these areas that traverse the core of the Monument is not considered appropriate.

With passage of Public Law 105-355 on October 31, 1998, a utility corridor was designated along Highway 89 in Kane County. Rights-of-way throughout the Monument, including within the designated and recommended corridors, would continue to be considered on a case-by-case basis after site-specific environmental analysis and determination of their conformance with the Approved Plan.

LAND-4

COMMENT: The provision for one access route per parcel on page 2.83 of the DEIS contradicts local safety ordinances.

RESPONSE: The criterion on subdivision access route(s) has been rewritten in this Plan to address any conflicts with local codes and/or ordinances (see the **Rights-of-Way** section in Chapter 2 of this Plan). In general, the BLM would authorize only one access route to private land parcels unless public safety or local ordinances warrant additional routes. Private land owners would be required to coordinate the development of access routes across public lands in order to prevent a proliferation of routes. Site specific NEPA analysis would be required, including

reasonable terms and conditions as necessary to protect the public interest and meet the objectives of this Plan.

LAND-5

COMMENT: How will community infrastructure needs be accommodated?

RESPONSE: As stated in the **Utility Rights-of-Way and Communication Sites** section in Chapter 2 of this Plan, Monument managers are committed to working in cooperation with local communities and utility providers to identify short-term and long range community needs which could affect Monument lands and resources. Community projects which require public lands access or use would be subject to necessary project level environmental analysis. The BLM would work with the project applicant to meet the Approved Plan objectives. Alternate locations for proposed projects would be identified when unavoidable conflicts arise. Such projects would be focused in appropriate zones (as described in the **Utility Rights-of-Way and Communication Sites** section in Chapter 2 of this Plan) in order to protect Monument resources.

LAND-6

COMMENT: Why was there no assessment of impacts of existing utilities, including maintenance and future upgrades?

RESPONSE: Impacts from existing powerlines and other utility facilities were evaluated prior to their installation, and prior to Monument designation. Maintenance of these existing utilities is allowed for in accordance with established rights-of-way agreements. Impacts of existing utilities and maintenance would not vary by alternative, so would not facilitate comparison among alternatives. Future utility rights-of-way are discussed by zone in this Plan. Regardless of which zone a project is proposed in, all projects would be evaluated on a case-by-case basis with appropriate NEPA analysis as they are submitted to the BLM. Zone criteria and utility needs of communities surrounding the Monument would be taken into consideration in determining which future projects would be approved.

LAND-7

COMMENT: The statement that an increase in voltage of the Cottonwood powerline could occur on existing structures is incorrect.

RESPONSE: The DEIS stated on page 4.51 that "no new structures or installations [would] be needed" for the upgrade of the Cottonwood Canyon powerline. This proposal refers to a December 1975 application to increase the voltage in the Cottonwood Canyon powerline from 245-kilovolts to 345-kilovolts (filed by Utah Power and Light, a subsidiary of PacifiCorp). A more specific description of the proposal is that it would raise the cross arms five feet on

the existing wood towers, add three insulators to each conductor, bundle the conductors, and add one X-brace to each existing tower for increased support. There has been no subsequent application filed for this proposed upgrade. As stated in the **Rights-of-Way** section in Chapter 2 of this Plan, subsequent environmental analysis and a determination of conformance with this Plan would be required before any action is taken.

LAND-8

COMMENT: The Washington County Water Conservancy District has plans to develop water from Lake Powell. How will the pipeline from Lake Powell to Sand Hollow Reservoir be accommodated?

RESPONSE: No application has formally been filed for the Lake Powell to Sand Hollow water pipeline. However, the tentative route would follow Highway 89 for most of its length. Per Public Law 105-355, signed by President Clinton on October 31, 1998, a utility corridor was designated along Highway 89 in Kane County, including that portion of Highway 89 within the Monument. The utility corridor extends 240 feet north from the center line of the highway, and 500 feet south from the center line of the highway. Location of the proposed water pipeline within this corridor is a possibility.

Subsequent environmental analysis would be required on any specific water pipeline proposal. A determination as to their

conformance with this Plan would also be required.

REC-1

COMMENT: Comments on group size ranged from "group size limits of 12 people and/or animals are too restrictive in the Primitive Zone" to "group size limits are not restrictive enough."

RESPONSE: Based on public comment and a re-evaluation of how group size best fits in with zone criteria, group size limits have been modified for this Plan. For example, group size limits in the Frontcountry Zone were lifted because of the interest in focusing visitation in this area and the difficulty in regulating group size on major highways. Further, group size limits in the Primitive Zone were changed from 12 people and/or animals to 12 people and 12 animals. This is consistent with adjacent National Park Service units. A discussion of group size limits for this Plan is included in the **Group Size** section in Chapter 2.

REC-2

COMMENT: Clarify what kinds of facilities will be developed along the Burr Trail, Cottonwood Wash Road, and in the Frontcountry Zone. Explain what the facilities are and explain how decisions to provide facilities will be made. The Burr Trail should not be in the Frontcountry Zone.

RESPONSE: A full discussion of facilities can be found in the **Facilities** section in Chapter 2. In the Frontcountry Zone, in addition to existing facilities, visitor day use facilities could include pullouts, parking areas, trailheads, toilets, fences, picnic areas, and scenic overlooks.

The Burr Trail has been changed from the Frontcountry Zone to the Passage Zone in this Plan because the BLM was persuaded by public comment that its character is more like that of other routes in the Passage Zone. Parts of the Cottonwood Wash Road are also in the Passage Zone. The condition of routes and/or distance from communities in the Passage Zone makes it a secondary zone for visitation, where facilities may occur, but visitation would not necessarily be directed or encouraged. Similar facilities as allowed in the Frontcountry Zone could be provided for resource protection, visitor safety, and for the interpretation of Monument resources.

REC-3

COMMENT: Impacts to outfitters and guides that use pack stock were not adequately addressed given the group size restrictions in the Primitive Zone.

RESPONSE: Page 4.41 of the DEIS provides a discussion of impacts to outfitters and guides. Although the discussion does not specifically distinguish between impacts to outfitters and guides that use pack stock and those who do not, a discussion of how group

size limits would restrict the size of the outings that outfitter and guides offer was included. The BLM does recognize that the impacts of limiting group size to "12 people and/or animals" would have been greater on those outfitters and guides that use pack stock, and this issue has been taken into account in developing group size limits for this Plan. Group size limits in the Primitive Zone of this Plan have been changed to provide for 12 people and 12 animals, as consistent with backcountry limits for adjacent National Park units. Chapter 3 of this Plan includes a discussion of impacts to outfitters and guides. Limitations on group size and allocations are discussed in this section.

REC-4

COMMENT: The statement that group size is the same as other Federally managed areas is false in the DEIS.

RESPONSE: Group size limits in the Primitive Zone have been changed for this Plan to 12 people and 12 animals. This makes this zone consistent with the portion of the Escalante Canyons managed by Glen Canyon National Recreation Area and with backcountry limits in Capitol Reef National Park. Group size limits are not necessarily consistent with other units such as Dixie National Forest.

REC-5

COMMENT: Horses and llamas have been restricted even though they do not have as much impact as vehicles.

RESPONSE: The BLM recognizes that the impacts of horses and llamas are different from vehicles. This Plan allows horses and llamas to travel cross-country, while vehicles may not. Horses and llamas are permitted in all zones, except where specifically excluded such as in relict plant areas. The restrictions on the number of recreational pack stock in the Primitive Zone are intended to keep impacts in these areas low.

REC-6

COMMENT: Why is there no differentiation in impacts between motorized and mechanized vehicular use?

RESPONSE: The DEIS discusses motorized and mechanized use as one type of impact. While the two modes of transportation are quite different and the magnitude of impact may differ, the types of impacts are similar. Both can cause damage to resources that are sensitive to surface disturbance, particularly biological soil crusts, special status plant species and other vegetation. So, for purposes of the decision to prohibit cross-country travel of both modes of transportation to protect Monument resources, and for purposes of analyzing that decision's impacts, the differences are not considered significant.

REC-7

COMMENT: What facilities (such as toilets and water) will accommodate increased visitation?

RESPONSE: The **Visitor Facilities in the Monument** section in Chapter 2 in this Plan, describes facilities that would be provided for each zone. As the focal point for visitation, facilities in the Frontcountry Zone could include pullouts, parking areas, trailheads, toilets, fences, and picnic areas. Similar facilities could be provided in the Passage Zone, but only those necessary to protect resources, educate visitors about Monument resources, or for public safety. In the Outback Zone, small interpretive signs to educate the public about a particular resource or safety sign may be installed at limited sites. Other facilities could be allowed for the protection of resources where other tools to protect resources could not be used. In the Primitive Zones limited signs could be allowed for resource protection or visitor safety. Such small directional signs may be needed, but would be rare. Water, toilets, and other visitor amenities would not be provided in the Primitive Zone.

REC-8

COMMENT: Various comments on special/competitive events were received ranging from "don't allow any special/competitive events" to "special/competitive events should be allowed

throughout the Monument." Specific requests to continue the Outlaw Trail Ride were received.

RESPONSE: Competitive events would not be allowed anywhere in the Monument as described in the **Competitive and Special Events** section in Chapter 2 of this Plan. Special events, such as cultural or educational events, may be approved if they meet other zone requirements. The Outlaw Trail Ride is not considered a competitive event, but is a special event, under the BLM Special Recreation Program.

REC-9

COMMENT: Why were outfitters and guides allowed in the Landscape Research Zone and not in the Transition Zone in Alternative C of the DEIS?

RESPONSE: The Transition Zone in Alternative C was designed to include areas with little evidence of past disturbance and use. The management emphasis for this zone was to keep use low. One way to keep use low was to not permit outfitter and guide services in this zone.

REC-10

COMMENT: How will visitor carrying capacity be determined and what is the baseline? How will allocation of visitors be implemented in the future?

RESPONSE: In conjunction with universities, the BLM is currently assessing backcountry recreation experiences and also inventorying backcountry campsites. These inventories, surveys and studies provide a baseline in order to develop an ongoing monitoring program and to assist in prioritizing areas that may require more restrictive management. No specific allocations for visitors are proposed in this Plan, but this could occur at a future time. In specific areas where excessive numbers of visitors would lead to overcrowding or would damage fragile resources, a limit on the total number of visitors in a given area at a given time would be established with appropriate NEPA analysis. A discussion of how allocations may be determined in the future is included in the **Recreation Allocations** section in Chapter 2 of this Plan.

REC-11

COMMENT: Clarify the campfire restrictions outlined in the DEIS. A variety of comments on campfires were received ranging from "campfires should be restricted further" to "campfires should not be restricted in the Escalante Canyons."

RESPONSE: Backcountry inventories are currently underway in the Monument to determine where and how many campsites are in the Escalante Canyons and other backcountry areas. These inventories note whether campsites are present and what type of impacts are present or absent. Campfire

evidence, human caused tree damage (such as chopping), and human waste are some of the impacts noted.

Campfire impacts are present in many of the inventoried sites especially those in the Escalante Canyons and Paria/Hackberry Canyons. Over 90 percent of campsites associated with alcoves had campfire impacts. Campfire impacts have the potential to adversely impact archaeological sites associated with alcoves. As a result, campfires would not be allowed in the Escalante and Paria/Hackberry Canyons and in other sensitive areas identified in the **Relict Plant Communities and Hanging Gardens** section in Chapter 2 of this Plan. Given the focus of visitors in the Frontcountry and Passage Zones, and the potential for proliferation of campfire impacts, campfires would only be allowed in designated fire pits, designated fire grates, or mandatory fire pans in those zones. Where campfires are allowed, fire pans would be encouraged in the Outback and Primitive Zones.

REC-12

COMMENT: What is the mountain bicycle policy? Why are there no mountain bicycle trails identified in the Plan, especially because impacts are lower than motorized vehicles?

RESPONSE: Mountain bicycle use was carefully considered as part of the overall transportation system. While the mode of transportation is quite different than that of

motorized vehicles, mountain bicycles and other mechanized travel can cause damage to resources sensitive to surface disturbance, particularly biological soil crusts, special status plant species, and other vegetation. Therefore, use is limited to designated routes and would not be allowed on trails or cross-country.

REC-13

COMMENT: Keep trails out of riparian areas where possible, where not possible; place away from streams.

RESPONSE: As discussed in the **Riparian** section in Chapter 2 of this Plan, where trails are permitted, they would be kept out of riparian areas wherever possible. Where this is not possible, trails would be designed to minimize impacts. Design provisions may include: placing trails away from streams, using soil stabilization structures to prevent erosion, and planting native plants in areas where vegetation has been removed. Vegetation may also be used as a natural barrier to discourage visitors from leaving delineated trails in sensitive areas.

To protect areas of critical resources, barriers may be constructed to prevent entry and/or trails may be temporarily closed to restore/revegetate degraded areas.

REC-14

COMMENT: Why are no trails or routes identified for specific users to create a complete recreational system?

RESPONSE: While recreation would be accommodated, and in some areas developed, within the Monument, the intent of these activities would be to contribute to the protection and understanding of Monument resources. The development of an extensive recreational system that provides routes and trails to accommodate each recreational user group would not meet the overall goals of limiting developed recreational sites to small areas of the Monument where visitors can experience, and come to better understand, the scientific and historic resources without serious impacts to the resources themselves. Recreational uses have been accommodated in this Plan to the extent considered consistent with the purposes outlined in the Proclamation.

REC-15

COMMENT: A "Full Recreational Development" alternative, or more economically beneficial alternative, was not considered. Consequently, Alternatives B through E have minimal to negative economic benefit for impacted communities when compared with the No Action Alternative.

RESPONSE: The DEIS explains on page 2.97 why a "Full Recreation Development"

alternative was not analyzed in detail. The Proclamation gives foremost regard to the scientific and historic objects of the Monument. Visitor use must be secondary to the protection of Monument resources under the Antiquities Act mandate to protect objects of historic and scientific value. While Alternative E emphasizes opportunities for visitors, it does so while complying with the goal of protecting Monument resources. A "Full Recreational Development" alternative would heavily emphasize recreation, and could include development of new mechanized or motorized trails, construction of new aircraft landing sites, provisions for extreme competitive events with accompanying facilities in the Monument's interior capable of accommodating large numbers of people. This scenario would place Monument resources at high risk of destruction or degradation. Emphasizing recreation over protection of Monument resources is not considered a reasonable alternative, and is not analyzed further.

REC-16

COMMENT: How far can vehicles be parked from a designated route for camping? Will there be other car camping guidelines/restrictions?

RESPONSE: Except in Wilderness Study Areas, or other identified areas, motorized or mechanized vehicles could pull off of designated routes up to 50 feet to park or disperse camp in the Outback Zone. Vehicles

would be required to use designated pull-offs and parking areas in the Frontcountry and Passage Zones. Camping in developed campgrounds or in designated primitive camping areas only would be allowed in the Frontcountry and Passage Zones. Dispersed primitive camping would be allowed in the Outback Zones and Primitive Zones, although vehicle camping in the Primitive Zone is not permitted. Permits would be required for all overnight use. See the **Camping** section in Chapter 2 of this Plan for a more complete description. Group size restrictions for zones and recommendations for campfires also apply to car camping.

WAT-1

COMMENT: If the BLM is going to acquire water, how will it be done? How will the BLM protect instream flows?

RESPONSE: The BLM could obtain water for Monument facilities or protection of Monument resources in several ways. This topic is discussed in the **Water** section in Chapter 2 of this Plan. The reader is urged to review this section for more details. The acquisition of water rights will be accomplished in full compliance with State and Federal law. The answer to this question, however, depends in part on the nature of the intended use. Following is a synopsis.

1. Water needed for Monument facilities.

The BLM may obtain water through the normal appropriative water rights process provided under Utah State water law. This would apply mainly to providing water for Monument facilities, such as visitor centers, campgrounds, and administrative offices.

2. Water needed as instream flows for Monument resources

A summary of the strategy outlined in Chapter 2 for assuring water availability for Monument resources is as follows (see the **Water** section in Chapter 2 for more detail):

(1) Ensure that land management policies protect water resources. Since much of the water important to the Monument falls as precipitation within the Monument, its continued availability can be ensured by appropriate land management policies within the Monument. The BLM will exercise its existing land management authorities to protect and retain all available water and natural flows in the Monument. Several decisions described in sections of this Plan are designed to meet this objective.

(2) Monitor to ensure water flowing into the Monument is adequate to support Monument resources. The purpose of the above measures is to protect water that originates in the Monument or water after it enters the Monument boundary. While these measures are currently considered adequate to

ensure the continued availability of water to support Monument resources, the BLM will also assess whether the water flows coming into the Monument continue to be adequate. This would be part of an overall strategy to assess the status of water resources within the Monument. The BLM would work with the Water Resources Division of the United States Geological Survey, the Utah Department of Natural Resources, and others to gather comprehensive information concerning precipitation, surface water flows, and subsurface water flows into and out of the Monument. This would include establishing additional stream-gaging stations at selected locations, and continued inventorying of water sources such as seeps, springs, and wells. Established climate-data stations would be an integral part of the hydrologic monitoring network.

(3) Other options for assuring water availability, if needed. At any point that the above data collection and assessment effort suggests that adequate water to protect Monument resources is not entering the Monument, or that water is otherwise being depleted to the detriment of the Monument, other measures for assuring water availability would be taken. These include: cooperating with Federal agencies that may already have Federal reserved water rights, working with the State of Utah, and other strategies described in Chapter 2 of this Plan.

WAT-2

COMMENT: What is your water development policy? Various comments ranging from "water developments should not be allowed" to "water developments should be allowed for livestock and wildlife purposes" were received.

RESPONSE: Development of water resources may be associated with building of visitor services. Major visitor services and facilities would be located outside of the Monument within the communities, thus water would come from the municipal supply. Limited visitor facilities (such as toilets) could be allowed inside the Monument in certain zones and any water needed for these facilities would be acquired through the standard application process through the Utah Division of Water Rights (discussed in the **Water** and **Facilities** sections in Chapter 2 of this Plan).

Water developments for community culinary water needs could be considered in appropriate zones if the applicant could demonstrate that the development would not affect Monument resources. This policy is discussed in the **Utility Rights-of-Way and Communication Sites** section in Chapter 2 of this Plan.

Other water developments could be used as a management tool for better distribution of livestock when beneficial to Monument resources or to restore or manage native

species or populations. These could be done as long as streams or springs would not be jeopardized or dewatered and when there is not other means to achieve the above objectives (discussed in the **Water-Related Developments** section in Chapter 2 of this Plan).

WAT-3

COMMENT: Explain how the description of perennial streams was arrived at in the DEIS.

RESPONSE: Determination of perennial streams and segments is based on historic data from United States Geological Survey (USGS) stream-gaging stations, hydrological observations, and classifications from USGS topographic quadrangle maps. Following is a discussion of the perennial streams in the Monument.

Perennial streams in the Monument within the Escalante River drainage include the Escalante River below the town of Escalante, Mamie Creek, Sand Creek, Calf Creek, Boulder Creek, and Deer Creek. During drier years, The Gulch, including Steep Creek, may become intermittent. The only other perennial stream within the Escalante River drainage inside the Monument is the last mile or so of Harris Wash before the stream leaves the Monument and passes into the Glen Canyon National Recreation Area. Comments received on the DEIS suggest that the lower part of Horse Canyon, just above its

confluence with lower Death Hollow, may also be perennial.

Most of the main stem of the Paria River within the Monument (about 30 river miles) flows on a perennial basis, but there are small reaches near the upper and lower extremities of the portion of the river within the Monument that are typically dry. The flowing reaches are fed by subsurface flows, springs and other groundwater expressions, and by bank storage after high flows. A reach of about 4 miles of Cottonwood Creek is also perennial in this drainage, but this creek normally is dry about 2 miles above its confluence with the Paria River. This portion of Cottonwood Creek is also kept flowing by springs and other surface expressions of groundwater. These gaining reaches of the Paria River and Cottonwood Creek are followed by losing reaches, however, where they each become intermittent streams, flowing only subsequent to precipitation events. Particularly during the irrigation seasons, the Paria is depleted seriously but still flowing when it reaches the northern Monument boundary. Shortly after entering the Monument, however, it commonly dries up for about 1 mile, then reappears and flows continuously until a point about 4 miles from where it again leaves the Monument boundary.

The only perennial streams within the Kaiparowits composite drainage are an approximately 8 mile section of Last Chance Creek (including the lowest 1 mile of one of

its tributaries, Drip Tank Canyon) and a 1 mile stretch in the lower portion of Croton Canyon.

WAT-4

COMMENT: How will the BLM protect water quality?

RESPONSE: The BLM would work with the State of Utah, Department of Environmental Quality (UDEQ), Utah Division of Water Quality (UDWQ) to accelerate development of total maximum daily loads, or TMDL. TMDL is a quantitative assessment of water quality problems, contributing sources, and load reductions or control actions needed to restore and protect bodies of water as required by section 303(d) of the Clean Water Act. The BLM is currently engaged in a water-quality monitoring program at 60 sites within the Monument, in conjunction with the UDWQ, to ensure that State and Federal water-quality standards will be met. The BLM would partner with UDEQ/UDWQ as water quality improvement programs are developed. A discussion on total maximum daily load and Section 303(d) of the Clean Water Act is included in the **Assuring Water Quality** section of Chapter 2 of this Plan.

WAT-5

COMMENT: Water rights should also be regarded as valid existing rights and described as such in the Proposed Plan.

RESPONSE: Water rights are not included in the section **Valid Existing Rights and Other Existing Authorizations** because they are granted through Utah State laws and regulations. All waters in Utah are public property. A water right is a right to the use of water based upon (1) quantity, (2) source, (3) priority date, (4) nature of use, (5) point of diversion and (6) physically putting water to beneficial use. Utah water rights are based upon the Doctrine of Appropriation, which is first in time are first in right. This means those with earlier priority dates who have continuously used the water since that time have the right to water from a certain source before others with later priority dates. The BLM has no authority to change priority dates or affect existing water rights. Access to develop water rights may be an issue. If access is needed across BLM land, such access would be handled as described in the **Rights-of-Way** section in Chapter 2 of this Plan.

WAT-6

COMMENT: What are 303d waters and how are they addressed in the Proposed Plan?

RESPONSE: Section 303(d) of the Federal Clean Water Act addresses water bodies and courses that are not "fishable, or swimmable." A 303(d) body of water is one that has been identified as possibly being in violation of state water quality standards. Section 303(d) requires each state to identify such waters and to develop total maximum daily loads

(TMDL) for them, with oversight from the U.S. Environmental Protection Agency. The TMDL is a quantitative assessment of water quality problems, contributing sources, and load reductions or control actions needed to restore and protect bodies of water. A complete discussion of 303(d) waters is found in the section on **Assuring Water Quality** in Chapter 2 of this Plan.

WAT-7

COMMENT: Why weren't the Kane County Water Conservancy District Plan (July 1997) and the Utah State Water Plan - Western Colorado River Basin Committee Review Draft (May 1998) reviewed or referenced in the DEIS?

RESPONSE: The Kane County Water Conservancy District Plan (July 1997) and the Utah State Water Plan - Western Colorado River Basin Committee Review Draft (May 1998) are referenced in Chapter 5, page 5.3 (Consultation and Coordination) of the DEIS. These plans were reviewed for planning consistency with the DEIS. They are also considered as part of the consistency review in Chapter 4 of this Plan.

WSA-1

COMMENT: Manage all Wilderness Study Areas as Wilderness.

RESPONSE: Wilderness Study Areas (WSAs) were established under the authority

of Section 603(c) of FLPMA. Through this law Congress directed the BLM to identify areas with wilderness characteristics and report back to Congress with recommendations. Once Congress designates an area as Wilderness, the BLM is authorized to manage it under the provisions of the Wilderness Act. However, before Congress takes action to designate a WSA as Wilderness, the BLM does not have the authority to manage these areas under the Wilderness Act.

Section 603(c) of FLPMA states that WSAs are to be managed in a manner that does not impair their suitability as Wilderness subject to the continuation of certain uses such as grazing. To comply with this mandate the BLM established Interim Management Policy (IMP) and Guidelines for Lands Under Wilderness Review which have been added to the BLM Manual System (BLM Manual H-8550-1). This BLM Manual provides detailed examples of how the Congressional mandate for WSA management is to be implemented and all BLM WSAs, including those in the Monument, must be managed in accordance with this policy.

WSA-2

COMMENT: How do the zones affect WSAs? Why aren't all WSAs in the Primitive Zone?

RESPONSE: Section 603 (c) of FLPMA requires that WSAs be managed in a manner

that does not impair their suitability as Wilderness, subject to the continuation of certain uses such as grazing. To comply with this mandate the BLM established IMP and Guidelines for Lands Under Wilderness Review, which have been added to the BLM Manual System (BLM Manual H-8550-1). The BLM's IMP Manual provides detailed examples of how the Congressional mandate for WSA management is to be implemented. All BLM WSAs, including those in the Monument, must be managed in accordance with this policy. To the extent that zone management prescriptions are consistent with the policy in the BLM's IMP Manual, activities in WSAs would be carried out in accordance with those zone prescriptions. However, those activities in WSAs that are permissible under zone management prescriptions but do not conform with the BLM's IMP Manual would not be permitted. In the future, should Congress legislate the release of WSAs from the requirements of section 603 (c) of FLPMA, they would be either be managed under the Wilderness Act if Congress designates them Wilderness, or the zone management prescriptions specified in the Approved Monument Management Plan.

WSAs and the Primitive Zone proposed in this Plan are fundamentally different designations. The Primitive Zone of this Plan is a set of management prescriptions that have been arrived at as a result of the land use planning process which involves balancing manageability considerations, competing

resource values, the requirements of the Proclamation, and applicable laws. The delineation of the boundaries for this Primitive Zone were determined by a combination of landscape and terrain features which can accommodate the management prescriptions appropriate to the zone.

The WSAs in the Monument, in contrast, are the product of an inventory, not a land use plan. The inventory which established these WSAs only considered the presence or absence of wilderness characteristics, not competing resource values, manageability considerations or resource quality. The delineation of WSA boundaries was determined by the naturalness of the area, not landscape or terrain features or a need to exclude incompatible resource uses.

The differences in WSA and Primitive Zone boundary delineation, designation process, and purpose, account for boundaries which do not completely coincide. Further discussion of WSAs is included in the **Wilderness Study Area** section in Chapter 2 of this Plan. A discussion of the criteria used to delineate the Primitive Zone can be found in Chapter 2.

WSA-3

COMMENT: Why were new areas of Wilderness in the Monument not recognized? Why were WSAs not considered for release from WSA designation? Wilderness should be used as management tool.

RESPONSE: The BLM does not have the authority to designate lands in the Monument as Wilderness. The Wilderness Act of 1964 states that Wilderness can only be designated by an Act of Congress. In section 603 of FLPMA, Congress directed that public lands which have wilderness characteristics shall be managed in a manner so as not to impair the suitability of such areas for preservation as Wilderness until Congress determines otherwise. Only Congress may release lands from WSA status. Section 603 of FLPMA also authorized the BLM to manage Wilderness under the provisions of the Wilderness Act. Should Congress designate Wilderness in the Monument, the BLM would manage such areas under the provisions of the Wilderness Act.

WSR-1

COMMENT: Some people commented that all 25 eligible river segments should be determined suitable to protect the rivers and water resources. Others commented that none of the eligible segments should be found suitable.

RESPONSE: The suitability determination process, while guided by specific factors, is subjective and left to professional judgement. The BLM carefully considered all relevant information, including input received during public comment, and evaluated segments for suitability. Although we received comments stating that all or none of the eligible segments should be suitable, there was not

enough accompanying documentation to convince the BLM to make changes. A more detailed discussion of the factors considered in the suitability evaluation is included in Appendix 11 of this Plan.

WSR-2

COMMENT: Various comments/questions were received regarding the impacts of Wild and Scenic River (WSR) designation. These include:

A. Effects of WSR designation on a permittee's ability to access existing range improvements, develop new range improvements, and consequences on other factors such as forage use limitations should be discussed.

B. Effects on private lands from WSRs should be discussed.

C. The DEIS states, "substantial public use puts Monument resources at high risk" and it states, "Designation would enhance the recreation values for this river system by keeping the canyon system intact and desirable for hiking." These statements are contradictory. It should be recognized and stated that designation may actually have a negative effect on specific segments.

D. Would Wild or Scenic River designation for the Paria River or Cottonwood Creek (or elsewhere) impair PacifiCorp's ability to operate, maintain, and upgrade facilities?

E. The DEIS states, "Designation would ensure that our knowledge would be enhanced by providing an additional reason for scientific study." How is this statement true compared to no designation?

F. There is a misleading statement in Appendix 5 (pages A5.9 and A5.22): "Designation would enhance the viability of the riparian communities." Designation alone would not do anything for the viability of the riparian communities, and in fact may hinder the viability of such communities by inviting increased visitors in the river segments.

G. Justify costs as a reason to drop river segments.

RESPONSE: It is important to note that this Plan does not designate any Wild and Scenic Rivers. WSRs may only be designated by Congress or the Secretary of the Interior at the request of the State Governor. This Plan only makes determinations about which segments are suitable for recommendation to Congress. The responses below refer to potential effects that may occur if Congress or the Governor requested the Secretary to designate.

A. Grazing is permitted on rivers designated as wild, scenic, or recreational, but must be managed to enhance the values for which the river was designated. Thus, livestock grazing and agricultural practices may continue at a level similar in nature and intensity to those present in the area at the time of designation,

as long as outstandingly remarkable values are protected.

B. Under the WSR Act, designation neither gives nor implies government control of private lands within the river corridor. Although Congress (or the Secretary of the Interior for 2(a)(ii) rivers) could include private lands within the boundaries of the designated river area, management restrictions would not apply.

C. While many of the Nation's rivers (including Wild and Scenic Rivers) have received increased use in recent years, the BLM is unaware of any research indicating that designation increases use. Even if designation did increase use, however, designation could also improve the ability to manage recreational uses and values through the increased focus that a WSR management plan provides.

D. Wild and Scenic River designation seeks to protect and enhance a river's current condition. Existing powerline or communication transmission rights-of-way could continue to be used and maintained upon designation. New proposals and upgrades would be evaluated in light of impacts to river values.

E. Wild and Scenic River "status" may provide additional rationale for studying those outstandingly remarkable values for which each segment was found eligible.

Designated rivers may also help prioritize research projects.

F. The Wild and Scenic Rivers Act states, "...selected rivers of the Nation which, with their immediate environments, ... shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected ..." There is a chance that without wild and scenic river designation, rivers could be dammed or diverted jeopardizing the instream flow in downstream segments. Therefore, designation could protect the viability of riparian communities by protecting the instream flow upon which these "immediate environments" rely.

G. The BLM determined that the Escalante and Paria river systems could better be managed by concentrating available management capabilities on those segments that contribute most to riverine values. However, costs were not the major factor in determining suitability of eligible segments. The primary factor in finding certain segments non-suitable was that they did not make substantial contributions to the National Wild and Scenic Rivers System or had management conflicts (see Response WSR-6).

WSR-3

COMMENT: Various comments were submitted regarding clarifications of the WSR planning process. These include:

A. Why were Wild and Scenic River studies included in your planning process?

B. Why were tentative classifications changed between eligibility and suitability to be consistent with the zones?

C. How did Wild and Scenic River planning fit in the Monument Plan process?

D. The Presidential Proclamation states that the Monument is subject to valid existing rights and does not reserve water as a matter of Federal law, so how does a WSR designation create an instream flow reserved right?

E. Few WSRs are needed because, like the ACECs, the general protection provided by the Monument designation is sufficient.

RESPONSE:

A. BLM Manual Section 8351 directs the BLM to evaluate all potentially eligible river segments within the resource management planning process to determine eligibility, tentative classification, protection requirements, and suitability under Section 5(d)(1) of the Wild and Scenic Rivers Act.

B. The primary considerations used in classification changes from the eligibility phase to the suitability evaluation phase were management prescriptions proposed for the segments under the Monument Management Plan. For instance, much of the Paria River

was classified as "recreational" in the eligibility phase as opposed to "wild" because of current motorized use. The DEIS determined that the Paria River would be managed in the future to meet certain prescriptions for primitive recreation and would not allow motorized access. Therefore, the recommended classification for much of the Paria suitability is "wild" in accordance with proposed management.

C. The eligibility phase of the WSR study was based on the presence or absence of outstandingly remarkable values and free flowing characteristics determined through an inventory. Preliminary eligibility findings were released for public review prior to the release of the DEIS. After review of public comment, final eligibility findings were released (see Appendix 4 of the DEIS for more detail). The suitability phase considered the eight factors outlined in BLM Manual Section 8351 and the Wild and Scenic River Act and management prescriptions outlined in the DEIS alternatives. Draft suitability recommendations were released with the DEIS in November 1998. Comments on the suitability phase of the process were received during the comment period for the DEIS. After review and consideration of these comments, the BLM is making recommendations on suitable segments in this Plan/FEIS.

D. This Plan does not state that an instream flow or a Federal reserved water right would

be established. The DEIS did state that Congress, or the Secretary of the Interior at the request of the State Governor, may designate a Wild and Scenic River within the Monument. Such a designation could reserve sufficient water to carry out the purposes of the designation, including instream flows, but would not displace any previously established private rights.

E. Unlike ACECs which the BLM can establish itself, WSR designations are made by Congress or by the Secretary of the Interior upon application of the State Governor. The BLM must complete its legal responsibilities required under the Wild and Scenic Rivers Act to allow others to make the ultimate decision.

WSR-4

COMMENT: A better explanation of how WSR tentative classifications were made should be provided.

RESPONSE: Classification for the eligibility phase of the WSR study was done using existing conditions and the level of development along river segments. Classifications in the suitability phase considered the factors outlined in the BLM Manual Section 8351 and Wild and Scenic Rivers Act, but also considered management objectives outlined by the DEIS alternatives.

WSR-5

COMMENT: Willis Creek should be determined eligible and suitable to protect riparian areas.

RESPONSE: Willis Creek has several diversions above the Skutumpah Road and was determined not to be free-flowing. This does not preclude protection of the riparian values of Willis Creek. As discussed in the **Riparian** section in Chapter 2 of this Plan, riparian resources are important in the Monument and would be protected under the Proposed Plan provisions.

WSR-6

COMMENT: Why were eligible river segments not included in the DEIS Alternative B suitable segments?

RESPONSE: The suitability determination process, while guided by specific factors, is subjective and left to professional judgement. The BLM carefully considered all the relevant information, including input received during the eligibility phase of the study, and evaluated segments for suitability. Although comments were received stating that all or none of the eligible segments should be suitable, there was not enough accompanying documentation to convince the BLM to make changes. A more detailed discussion of the factors considered in the suitability evaluation is included in Appendix 11 of this Plan.

Cottonwood Canyon, Wolverine Creek, Little Death Hollow, Phipps Wash, Cottonwood Creek, parts of Harris Wash (parts that do not have known southwestern willow flycatchers), side canyons into The Gulch, Water Canyon, Blackwater Canyon, Lamanite Arch Canyon, Bull Valley Gorge, Dry Hollow Creek and the unnamed tributary west of Calf Creek were found non-suitable because the quality of river characteristics in these segments would not significantly enhance nor contribute to the National Wild and Scenic River System. Nevertheless, the outstandingly remarkable riparian, scenic, geologic, recreational, cultural, and habitat values identified for these rivers would be protected under this Plan.

Lower Horse Canyon, while eligible, was found non-suitable because of management conflicts (one of the suitability criteria identified in BLM Manual Section 8351). An existing water diversion in that segment of the river could be used in the future to remove livestock grazing from the riparian area, which would conflict with WSR status.

WSR-7

COMMENT: The BLM has added "when evaluated in the context of an entire region" to outstanding remarkable values. This has excluded many segments from eligibility. The BLM has insufficient information regarding the presence or absence of threatened and endangered species to determine eligibility.

RESPONSE: BLM Manual 8351 states that the following must be considered in determining outstandingly remarkable values: scenic, recreational, geologic, fish, wildlife, cultural, historic, and other similar values. In addition, the manual also states that BLM State Directors may prescribe supplemental standards or criteria for determining outstandingly remarkable values. An interagency agreement signed in December of 1994 by the Utah State Director, and a Utah Interagency Memorandum of Understanding signed in January of 1998, dictates that "Resources should be at least regionally significant to be deemed outstandingly remarkable. To make this determination, a region should be explicitly delineated so that the significance of the rivers under review can be compared against others in the region. Selection of a region of an appropriate size and character is critical in arriving at a realistic determination of regionally significant rivers. To fine-tune the resource assessment, a set of comparative regions can be delineated according to the specific resources along the river(s) being evaluated."

The BLM is directed to consider WSR viability during the land management planning process. The BLM did so with the best data available to us at the time. Known threatened and endangered species sightings were a factor used to qualify a river segment as "eligible" in this process.

WSR-8

COMMENT: Explain the difference between Cottonwood Wash and Cottonwood Creek in the WSR planning process, and why Cottonwood Creek along the Cottonwood Road was not eligible in the DEIS.

RESPONSE: Cottonwood Wash (page 4.9 of the DEIS) is located east of Highway 12 along the Hogback. Cottonwood Creek, located along Cottonwood Road, was determined not to be free flowing on the upper end and not significant in the region of comparison and thus was not considered eligible.



